

AFFORDABLE HOUSING IN HIGH OPPORTUNITY AREAS: AN EXAMINATION OF
EFFECTIVE QUALIFIED ALLOCATION PLANS

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Introduction

The largest funding source for affordable housing is the Low-Income Housing Tax Credit (LIHTC) program, which was created by Congress in the Tax Reform Act of 1986 to encourage developers to construct housing units for low-income households. The program distributes tax credits on a competitive basis to developers through each state's Qualified Allocation Plan (QAP). Each state's Housing Finance Agency (HFA) sets priorities through point categories in its QAP and developers must meet a certain set of criteria to qualify for each point category. The weight of various point categories indicates a state's housing priorities, such as creating point categories for locational characteristics (e.g. proximity to transit, proximity to high-performing schools, targeting low-income census tracts, etc.) or targeting specific populations (e.g. seniors, formerly homeless individuals, families, etc.). Every state creates and weights point categories differently, which has a significant impact on the geographic distribution of LIHTC projects.

Tax credit awards provide a dollar-for-dollar offset against the federal income tax liability. Most developers sell these credits to investors and use the proceeds from the sale to build the project. Awarded tax credits are allocated over a ten-year period and projects must remain affordable for at least 15 years, although many states require longer affordability periods. In order to qualify for the program, developers have two affordability options: 1) at least 20% of the planned units must be affordable and occupied by households that earn no more than 50% of the Area Median Income (AMI); or 2) at least 40% of the planned units must be affordable and occupied by households that earn no more than 60% AMI. Each state receives approximately \$2.30 per resident or a minimum of approximately \$2.3 million in LIHTC. Developers apply directly to an HFA through a competitive process to receive tax credits. Competition for tax credits is often fierce as funding is limited. For example, in Indiana, only about 25% to 35% of proposed projects are funded each year.

Since 1986, the LIHTC program has financed nearly 3 million affordable units for families, senior citizens, persons with disabilities, and permanent homes for the formerly homeless (Spotts, 2016). The benefits of affordable housing programs are not limited to simply providing quality homes and apartments. Recent findings have shown that well-located affordable housing can have positive impacts on resident health, economic mobility, and educational attainment.

Unfortunately, however, the need for affordable housing is growing. In 2015, 11.8 million households were “severely housing cost burdened”—households forced to devote more than 50% of their income to housing costs. By 2025, that number is projected to increase to 13.1 million households (Spotts, 2016). Furthermore, the recent affordable housing crisis in the US has disproportionately impacted low-income, non-white populations. Due to subprime lending during the housing bubble of the early 21st century, Hispanics lost 66% of household wealth through foreclosure, blacks lost 53%, while whites lost only 15%. Nationwide, half of all black and Hispanic children live in “housing-cost burdened households”—households spending more than 30% of their income on housing costs. Meanwhile, only 1/3 of white children live in housing cost burdened households (Rose & Miller, 2016, p. 11).

A dearth of high-quality affordable housing options coupled with rising housing costs has forced many households to remain in high-poverty, racially segregated areas. These households are thereby forced to live in areas with little to no access to employment, healthy opportunities, and quality education. Decades of deliberate investment in segregational housing policies at the federal, state, and local levels have not only contributed to, but in many cases, are directly responsible for, these injustices. Through the concentration of affordable housing in low-income,

minority communities, federal dollars have perpetuated segregation into the 21st century, more than 50 years after the enactment of the 1968 Fair Housing Act.

In order to break the cycles of poverty and ensure that all residents have access to economic, social, and educational opportunities, HFAs must craft QAPs that incentivize the development of LIHTC housing in more affluent, high-opportunity areas. This study explores previous findings and examines the QAPs from states that have had the most success locating LIHTC housing in large, low-poverty communities. First, states that have successfully created housing opportunities in low-poverty communities were identified. Next, states with no LIHTC housing in their largest low-poverty communities were identified. Then the QAPs each of these states were examined to determine best practices. Through this research, the most successful strategies for awarding points in QAPs were identified, with the goal that Housing Finance Authorities around the country might more effectively encourage affordable housing in high-opportunity areas.

Literature Review

The U.S. has a long history of creating and investing in discriminatory housing policies. In the 1896 case *Plessy v. Ferguson*, the Supreme Court upheld racial segregation under the doctrine of “separate but equal.” For years thereafter, realtors steered black families into specific neighborhoods while the Federal Housing Administration flatly denied mortgages based upon race. Regardless of income or creditworthiness, the Federal Housing Administration refused to insure loans in neighborhoods that were predominately black, and typically avoided inner city neighborhoods entirely. Until the creation of the Fair Housing Act in 1968, the federal government deliberately discouraged homeownership among black Americans and actively invested in white-flight into the suburbs. Black neighborhoods were regularly denied access to

capital and experienced significant declines in home values, spurring additional disinvestment (Long, 2010, p. 87-89).

After more than 200 years of deliberate discriminatory policies, the passage of the 1968 Fair Housing Act finally protected people from discrimination when renting, buying, or securing financing for housing. Specifically, the Fair Housing Act protects against discrimination based on race, color, national origin, religion, sex, disability, and the presence of children (Long, 2010, p. 90). But despite such assurances, low-income and non-white populations are often still trapped in high-poverty neighborhoods. Over 14 million people live in racially/ethnically concentrated areas of poverty, defined as census tracts where the family poverty rate is above 40% and over 50% of residents are persons of color (Rose & Miller, 2016, p.12). The consequences of concentrated poverty are well documented. According to findings from the Brookings Institute,

“[r]esidents of poor neighborhoods face higher crime rates and exhibit poorer physical and mental health outcomes. They tend to go to poor-performing neighborhood schools with higher dropout rates. Their job-seeking networks tend to be weaker and they face higher levels of financial insecurity...The many barriers imposed by living in a poor neighborhood make it that much harder for residents to move up the economic ladder, and their chances of doing so only diminish the longer they live in such neighborhoods” (Kneebone, & Holmes, 2016, p. 4).

Due to the history of discriminatory housing policies, the Fair Housing Act mandates that all federal housing programs “affirmatively further fair housing,” and requires state and local governments to provide and promote integrated housing opportunities. Government entities are not only prohibited from investing in housing policies that segregate, but must take deliberate steps to encourage integration. However, most federal, state, and local dollars give preference to projects that are located within already low-income communities, further concentrating poor

residents and keeping them from potential economic and education opportunities (Long, 2010, p. 76).

The Low-Income Housing Tax Credit program was created in 1986 in response to the history of problematic government-run affordable housing programs. After several infamous failures (notably Pruitt-Igoe, Robert Taylor Homes, etc.) and decades of evidence suggesting that government entities do not build or maintain the best housing opportunities for low-income residents, the LIHTC program was developed to provide financial incentives for private developers to create and manage affordable housing. Despite measured success, James Long argues in a 2010 study that:

“Some researchers suggest that LIHTC units are more likely to be built in suburban and low-poverty areas than other project-based affordable housing programs. However, the results of these studies do not lead to the conclusion that current LIHTC allocations are focused on high-opportunity areas. The research merely suggests that in a panoply of bad siting practices among affordable housing programs, LIHTC is less bad than other programs” (p. 96-97)

Other studies have found that compared to residents with Housing Choice Vouchers, residents of LIHTC properties are more likely to be concentrated in fewer census tracts which are predominately low-income or extremely low-income (Deng, 2007).

Recently, these siting issues have been brought to the forefront, forcing HFAs to reevaluate their QAPs. In 2003, the Fair Housing Center sued the New Jersey Housing and Mortgage Finance Agency (HMFA), challenging the state’s QAP which prioritized locating LIHTC developments in high-poverty areas. The Fair Housing Center argued that HMFA failed to affirmatively further fair housing. Although the Fair Housing Center lost the case, the New

Jersey QAP has since changed to include priority for mixed-income developments. The court ruled in the Fair Housing Center case in New Jersey that the HMFA is a *funding* agency, not a siting agency, meaning that the HFA is not required to steer development into specific neighborhoods based on racial composition (Long, 2010). However, Long (2010) argues that:

“HFAs can and should adopt LIHTC allocation plans that consider the siting effects of LIHTC units. This is not to say that LIHTC units should never be located in pockets of concentrated poverty, but rather that the existing practice in some state of placing them in mostly high-poverty areas is wrong-headed and illegal” (p. 80).

This ruling was later overturned during a similar case disputed in 2015. The Supreme Court ruled in the *Texas Department of Housing & Community Affairs v. Inclusive Communities Project, Inc.* (2015) that even policies that unintentionally segregate minorities to low-income areas violate the Fair Housing Act. The Supreme Court found that the practices of the Texas Department of Housing & Community Affairs violated the Fourteenth Amendment and created a disparate impact through its QAP. Between 1999 and 2008, nearly half of the projects approved by the Texas Department of Housing & Community Affairs were located in areas where whites comprised less than 10% of the population. Indeed, in Dallas, 92% of all LIHTC units were built in majority-minority census tracts (Harvard Law Review, 2015, p. 322). Although the Texas Department of Housing & Community Affairs was not intentionally segregating minority residents through its tax credit allocation, it was still found in violation of the Fair Housing Act because it failed to affirmatively further fair housing (Harvard Law Review, 2015, p. 321). This case underscored the importance and power of location-based points in QAPs.

Although HFAs are principally funding agencies, industry professionals agree that QAPs strongly influence developer siting choices, essentially empowering HFAs with the siting of

LIHTC properties. Due to the competitiveness of the LIHTC program, developers must “chase points” when deciding which properties to develop. A difference of a half point can determine which projects are funded or rejected, and developers will select locations that will score well based on a QAP’s priorities (Khadduri, 2013). An analysis conducted by HUD’s office of Policy Development and Research found that there are statistically significant correlations between changes in QAPs and siting of LIHTC properties. States that increase priorities in QAPs towards higher opportunity, lower-poverty areas successfully decreased the number of projects in high-poverty areas. Therefore, due to these differences in priorities and point categories, there can be significant variation in the siting of LIHTC properties. For example, the same study compared the projects awarded between 2011 and 2013 in Arizona and Nevada. In Arizona, only 2.3% of LIHTC units were located in low-poverty neighborhoods while in Nevada, 40% of LIHTC units were located in low-poverty neighborhoods (Ellen et.al., 2015).

To ensure that LIHTC developments are built in high-opportunity areas, Spotts (2016) argues that HFAs should adopt “location-sensitive cost evaluations” (p. 30). Potential sites in high-opportunity areas most likely have higher acquisition costs, and depending on the QAP, this may prohibit LIHTC housing from being built in those locations. Virginia, for instance, creates distinct cost caps for higher-cost urban areas, but does not account for cost differences between neighborhoods. Minnesota allows higher awards for developments located within growing job centers or intensive community revitalization areas, while Maryland offers a basis boost for “Family Housing in Communities of Opportunity” (p. 31).

Oppenheimer’s “Building Opportunity II: Civil Rights Best Practices in the Low Income Housing Tax Credit Program,” (2015) analyzed each state’s QAP, as well as the separate QAPs for New York and Chicago, to compare scoring categories that have the potential to

desegregate affordable housing and expand housing opportunities for low-income renters. Oppenheimer categorized each QAP based on 23 factors, including neighborhood standards, tenant targeting standards, and reporting standards. These factors were then ranked based on strength of the criteria towards a proposal's overall score. Oppenheimer found that many QAPs include point categories aimed at deconcentrating affordable housing, building in amenity-rich areas, and coordinating affordable housing development with community revitalization efforts. However, with the exception of Massachusetts, North Carolina, and Pennsylvania, QAPs do not explicitly mention racial/ethnic segregation patterns despite the fact that many geographic targeting categories have an impact on these patterns.

A major barrier for many HFAs to encourage development in high-opportunity areas is the federal tax code requirement that QAPs give preference to Qualified Census Tracts (QCTs). QCTs are areas where 50% or more of households have an income that is less than 60% of the area median income (Long, 2010, p. 84). In fact, many argue that due to the federal requirement to incentivize building in QCTs, the LIHTC program has further concentrated low-income residents in the poorest census tracts. The first national study of the LIHTC program in 1995 found that 74% of LIHTC units were located in predominately low-income neighborhoods (Poverty & Race Research Action Council, 2004). Due to these siting issues, many advocacy groups argue that the LIHTC program has failed to create opportunities for low-income residents and has contributed to segregational housing patterns.

Although many studies have compared QAP point categories and explored segregational federal housing policies, few have been completed since the *Texas Department of Housing & Community Affairs v. Inclusive Communities Project, Inc.* Supreme Court case, which had a major impact on the industry. Furthermore, few studies have been completed that focus

specifically on siting LIHTC housing in low-poverty communities. Most previous studies have examined high-poverty, racially concentrated communities. Therefore, this study was created to examine the LIHTC program from the perspective of low-poverty, high opportunity areas.

Methodology

This research utilizes a pragmatic, practice-oriented approach to the United States' affordable housing crisis. Using a mixed-methods research design, this study evaluates the QAPs of states that have successfully located LIHTC projects in the largest low-poverty municipalities as well as the QAPs from states that have no affordable housing in the largest low-poverty communities. This research utilizes an explanatory sequential method, with a quantitative approach followed by qualitative methods.

Large, low-poverty communities were defined as municipalities with 50,000 people or more with a poverty rate of less than 8%. Twenty-seven states had cities that matched these criteria. In order to ensure that all states were included in this study and that a sufficient number of municipalities were included, the population criteria for communities was then expanded. In the 23 states that did not meet the aforementioned criteria, the largest three municipalities with a poverty rate below 8% were included in the study. A complete list of municipalities included in the study can be found in Appendices B and C.

After selecting the municipalities to be included in the study, HUD data was referenced to examine how many LIHTC projects are located in each municipality. HUD only provides data for LIHTC developments through 2014, so more recently awarded projects were not included. Unfortunately, there was too much missing data to examine the precise number of *units*, and this study therefore only examines the number of *projects* in each of the selected municipalities. The

proportion of LIHTC projects to the state's population was compared with the proportion of LIHTC properties to the population of the selected low-poverty municipalities. Finally, the QAPs from states with a higher or similar proportion of LIHTC projects in low-poverty communities were examined to understand how these state HFAs have incentivized building in high opportunity areas. New York City and Chicago have separate QAPs and LIHTC allocations, so these cities were not included in the study. Appendices A and B includes the data for all existing LIHTC properties while Appendix C only includes LIHTC developments that have been built between 2010-2014.

Because QAPs are revised either every year or every other year, and many Housing Finance Authorities had not been prioritizing high opportunity areas until recently, the most successful states were determined by the projects that were allocated credits between 2010 and 2014. The least successful states, however, included all existing LIHTC projects.

Findings

Arkansas, Delaware, Idaho, Maryland, Missouri, New Hampshire, North Dakota, and West Virginia were identified as the most successful states at encouraging LIHTC housing in low-poverty communities between 2010 and 2014. These states had at minimum the same proportion of LIHTC properties in low-poverty communities compared to the state-wide proportion. States without any LIHTC projects in the selected large, low-poverty communities throughout the history of the program include Nebraska, Nevada, New Mexico, New York, Ohio, Vermont, and Wyoming. The QAPs from these states were compared to the most successful states to determine potential best-practices and successful LIHTC procedures. A summary table can be found below

High-Performing States	Number of LIHTC Projects in Selected Low-Poverty Municipalities 2010-2014	Percent of Total QAP Points focused on Opportunity Areas
Arkansas	5	8.4%
Delaware	2	17.9%
Idaho	1	10.8%
Maryland	7	14.0% (Also includes a set-aside for Opportunity Areas)
Missouri	8	N/A (QAP does not specify point amounts. Opportunity Areas are given "Preference")
New Hampshire	1	5.1%
North Dakota	4	7.4%
West Virginia	1	15.0%
Low Performing States	Number of LIHTC Projects in Selected Low-Poverty Municipalities All Time	Percent of Total QAP Points focused on Opportunity Areas
Nebraska	0	0%
Nevada	0	3.6%
New Mexico	0	1.7%
New York	0	4.4%
Ohio	0	11.4%
Vermont	0	N/A (QAP does not specify point amounts. "Preference" given to communities with low vacancies)
Wyoming	0	10.1%

The states that have had the most success locating LIHTC projects in low-poverty communities had QAPs that typically included:

- **Using point categories to encourage development in high-opportunity areas—**
100% of QAPs from high-performing states

- **Providing a basis boost for projects located in high-cost or high-opportunity areas**—50% of QAPs from high-performing states
- **Minimal points for QCTs**—50% of QAPs from high-performing states
- **Using a regional definition for geographically targeted locations**—13% of QAPs from high-performing states
- **Data-driven QAPs that target specific census tracts**—38% of QAPs from high-performing states
- **Limited cost-containment measures** —88% of QAPs from high-performing states

A summary chart of these findings can be found below:

High-Performing States	Location-based Point Categories	Basis Boost for Opportunity Areas	Minimal QCT Points	Regional Definitions	Data-Driven QAP	Limited Cost Containment
Arkansas	Yes	Yes	Yes	No	No	Yes
Delaware	Yes	Yes	Yes	No	Yes	Yes
Idaho	Yes	Yes	Yes	No	No	Yes
Maryland	Yes	Yes	No	No	Yes	Yes
Missouri	Yes	No	No	Yes	No	Yes
New Hampshire	Yes	No	No	No	No	No
North Dakota	Yes	No	No	No	No	Yes
West Virginia	Yes	No	Yes	No	Yes	Yes

Point Categories to High-Opportunity Areas

All of the QAPs from the states that have been most successful at locating affordable housing in low-poverty communities include at least one location-specific point category or set-aside. Set-asides reserve a percentage of a state’s total tax credit allocation for specific priorities, such as funding through non-profit organizations or reserving a certain percentage of the tax-credit for specific geographies or populations. Many such QAPs, including those from Arkansas,

Delaware, Missouri, West Virginia, Idaho, and Maryland use scoring to incentivize building near amenities such as grocery stores, high-performing schools, parks, libraries, hospitals, and public transit stops. Other QAPs use community characteristics and data analysis to define housing markets throughout the state to target investment into specific areas. Missouri’s QAP, for instance, prioritizes “Opportunity Areas” in its QAP by encouraging:

“affordable housing developments in opportunity areas by targeting communities that meet the following criteria: access to high-performing school systems, transportation and employment; as well as being located in a census tract with a 15% or lower poverty rate. 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%. The plan must include a Special Marketing Reserve to assist in initial relocation expenses for families with children” (2016, p.16).

West Virginia has multiple location-based point categories for high-opportunity areas. Specifically, the West Virginia QAP provides up to 10 points for each of the following categories:

- Developments located in census tracts with a high percentage of owner-occupied units
- Developments located in census tracts with a low percentage of households with more than one occupant per room
- Developments located in census tracts with a low percentage of the population that falls below the poverty line
- Developments located in census tracts with a low percentage of households receiving food stamps
- Developments located in census tracts with a low unemployment rate
- Developments located in census tracts that have a high percentage of the population 25 years of age or older with a Bachelor’s degree or higher (p. 35-41)

Maryland provides up to 16 points for family projects located in “Communities of Opportunity,” which is based on an index developed by the state’s HFA. Maryland focuses on community health, economic opportunity, and educational opportunity and maps each community on a publicly available GIS. The index is defined by household incomes, homeownership rates, population growth, poverty rate, vacancy rates, unemployment rates, commute times, Maryland School Assessment Scores, and educational attainment. Maryland’s QAP is unique in that it allows for “bonus points” in specific instances at the discretion of the Maryland HFA (2016, p. 72-73).

Many of the QAPs from states with no LIHTC housing in their largest low-poverty areas do not have point categories for high opportunity areas. For example, Nebraska’s only location-based point category is for developments located in communities of 5,000 people or less. New Mexico’s QAP focuses on allocating points based on programming for residents instead of location-based point categories. While New Mexico’s QAP does provide 3 points for projects located near transit, it doesn’t offer points for locating near schools, job opportunities, etc.

Some QAPs from low-performing states that *do* have location-based point categories prioritize other categories over locational characteristics. For example, Nevada provides 3 points for projects located in a non-CDBG eligible census tract (defined as a location where at least 51% of residents are low-to-moderate income) but also provides up to 10 points for providing a pool and hot tub on-site. This indicates that HFAs must do more than simply provide point categories for opportunity areas. QAPs must strategically weight point categories to ensure that the overarching goals of the program are actually met.

Basis Boost for High-Cost/High-Opportunity Areas

50% of states that have successfully located LIHTC housing in low-poverty areas provide a basis boost for developments in high-opportunity and low-poverty areas. A basis boost provides an opportunity for a development to be eligible for a 30% increase in the maximum tax credit award if it meets a specific set of criteria. Arkansas provides a basis boost for any project that “is located in a county in which a tax credit award has not been made in the past three (3) years” (2016, p. 4). Delaware provides a basis boost of up to 30% for projects “located in Areas of Opportunity as defined in DSHA’s Balanced Housing Opportunities Map” (2017, p. 8).

Many of the QAPs produced by states without LIHTC in low-poverty areas only provide basis boosts for Difficult to Develop Areas (DDAs) and Qualified Census Tracts (QCTs). Difficult to Develop Areas are HUD designated areas with high construction, land, and utility costs compared to the AMI. Most of these states do not provide additional funding for high-cost/high-opportunity areas.

Minimal points for QCTs

Although including incentives for QCTs is a federal requirement, 50% of the states that have been the most successful in located LIHTC in low-poverty areas provide minimal points for this category. Delaware, Minnesota, and Idaho provide just 1 point for developing in QCTs. Both Arkansas and West Virginia allocate a slightly higher percentage of points for QCTs, but to qualify for these points, the QCT must have a redevelopment plan, and the proposed LIHTC project must be specifically mentioned within the plan. States that do not have LIHTC housing in low-poverty areas typically provide more points for developing in QCTs. Wyoming provides 5 points for QCTs out of a necessary 160 points and New Mexico gives 5 points out of a necessary

100 to 115 points. Furthermore, these states typically did not require the QCT to be part of a comprehensive revitalization strategy.

Using a Regional Definition for Geographic Boundaries

Many QAPs define geographies at a county or municipality level. For example, Indiana has set-aside categories for rural, small-city, and large-city geographies. These set-asides are defined by municipal boundaries, causing a number of municipalities to be incorrectly defined as “rural.” One is Beech Grove, a small municipality located within the Indianapolis city-limits. The other is the most affluent municipality in the state of Indiana, Zionsville, which is located in suburban Indianapolis. By limiting geographic point categories and set-asides to county and municipal boundaries, many QAPs miss the realities of housing market.

Missouri, one of the states that has been the most successful at located LIHTC in low-poverty areas, has a more regional approach, providing a more holistic view of an area’s housing market. Missouri allocates its credits through a population proportionate basis. The St. Louis region, which includes St. Louis, St. Louis County, Franklin County, Jefferson County, and St. Charles County, receives approximately 33% of the allocation, the Kansas City Region receives 19% of the allocation, and the rest of the state receives 48% of the state’s allocation (2016, p. 17). Missouri’s QAP then incentivizes building in under-served areas by requiring that new construction proposals: 1) not locate in census tracts where more than 20% of the residential units are publicly subsidized, and; 2) if located within the St. Louis or Kansas City region, not locate within a 1-mile radius of any development funded by MHDC within the last two years (with some exceptions).

Data-Driven Policies

38% of states, including Delaware, Maryland, West Virginia, have robust, data-driven QAPs. Delaware works with a public-policy consulting group to develop 5-year Housing Needs Assessment. Although not included in this study, Minnesota conducts its data analysis in-house through its Policy and Research Department. These states include numerous maps and tools which target specific communities and census tracts for investment, and based on this data, the HFAs develop priorities and set-asides. Delaware's data-driven and location-based point category can be found below:

Promoting Balanced Housing Opportunities (5-10 points)

In order to balance housing investments and encourage the creation of affordable housing opportunities within the State of Delaware in areas that contain little or no affordable housing, but which may offer economic opportunity, proximity to the workplace, high performing schools, or supportive infrastructure, points will be awarded to developments that are in Areas of Opportunity. Developments can be Preservation or New Creation. Points will be awarded as follows:

Points	% of Units Located in Area of Opportunity
0	0%-49.9% of Total Units
5	50%-99.9% of Total Units
10	100% of Total Units

DSHA has defined areas of the State as follows:

- Distressed – ‘Racially/Ethnically Concentrated Areas of Poverty’^{*1}, Delaware Market Areas G and H^{*2} OR Wilmington Market Areas F, G, and H^{*3}, Downtown Development Districts, and isolated Rural Communities. These areas are where sustainable long-term homeownership opportunities should be supported. These are the same areas where development that furthers highly-concentrated areas of minorities or poverty should be limited.
- Stable – Delaware Market Areas D, E, and F^{*2} OR Wilmington Market Areas C, D, and E^{*3}. These areas are where a balance of market rate and subsidized housing should be supported.
- Areas of Opportunity – Delaware Market Areas A, B, and C^{*2} OR Wilmington Market Areas A and B^{*3} and/or areas where students are attending schools achieving a proficiency level^{*4} of 90% or higher. These are strong, high-value markets where new affordable housing opportunities should be supported.

*¹ As defined by U.S. Department of Housing and Urban Development

*² As identified in *Delaware Housing Needs Assessment, 2015 – 2020*

*³ As identified in that Wilmington Market Valuation Analysis, developed by the Reinvestment Fund in 2015

*⁴ School Attendance Boundary Information System (SABINS), 2012. Values are percentile ranked and range from 0 to 100; the higher the score, the higher the quality of the school system in a neighborhood.

DSHA maps that include all defined areas are available under Balance Housing Opportunities Maps at the following link:

<http://delaware.maps.arcgis.com/apps/webappviewer/index.html?id=e93dabfce6af4a94870111a1489bb1b0>

(2017, p. 49-50). Data driven policies like Delaware’s utilize census tracts to define opportunity areas, which provides a more realistic view of urban geographies than simply using municipal or county boundaries.

Surprisingly, Ohio—a state that does not provide LIHTC housing in its largest low-poverty areas—does seem to have a highly data driven QAP. Each year, the Office of Affordable Housing Research and Strategic Planning conducts an Ohio Housing Needs Assessment about affordability, housing-cost burdens, occupancy, population growth/decline, etc. Although this informs much of the state’s QAP, it seems that most of the analysis is done at a county level instead of a census tract level, like with the Delaware, Maryland, and Minnesota QAPs. Counties can have considerable differences within their borders, particularly in urban areas. This finding therefore indicates that census tract level analysis leads to better outcomes than a county-level strategic focus.

Minimal Cost-Containment Incentives

Finally, 88% of QAPs that have been the most successful at providing LIHTC housing in low-poverty communities have minimal point categories for cost-containment measures. Cost-containment measures are point categories or threshold requirements that focus on minimizing the cost of developments with the goal of keeping costs reasonable and to more efficiently allocate a limited financial resource. Unlike other states that encourage low-cost developments (often through tax-credits per unit or tax-credits per bedroom) by distributing points competitively between projects, the QAPs from the most successful states either do not have a cost-containment point category (Missouri, Arkansas, and North Dakota), provide comparatively few points for lower-cost developments (Delaware), or simply provide a threshold for projects to meet. These states do not have competitive cost-containment measures that allocate points based on how each project compares to the other projects in that funding round.

States that do not have LIHTC in low-poverty areas often encourage cost-containment through competitive point categories. For example, the QAP from New Mexico distributes 20% of its necessary points to proposals that meet its cost-containment measures. Another notable example is Ohio, which has different funding limits and cost-containment measures for urban and non-urban counties and requires projects score at least 80 points, 20 of which are available through cost-containment measures. Suburban counties are considered non-urban and are only allowed to apply for \$800,000 in LIHTC, compared to urban counties which can apply for \$1,000,000. However, suburban land-acquisition costs are often as expensive, or even more expensive, as those in urban areas. Suburban developments must compete with rural developments (with lower land-acquisition costs than either urban or suburban sites) in the cost-containment point categories, which likely makes these projects significantly less competitive in scoring. Due to these funding limitations, developers may not be able to make suburban deals work financially, and those that do make financial sense may not be able to score high enough in the cost-containment categories to remain competitive.

Additional Factors

A 2016 study conducted by the U.S. Government Accountability Office found that over half of all QAPs do not meet the requirements of Section 42 of the Internal Revenue Code because these documents do not explicitly state the selection criteria and preferences that determine the allocation of credits (p. 2). Both Vermont and New York's QAPs did not provide clear definitions or point criteria, and were found to not have any LIHTC housing in large, low-poverty communities. Although New York does provide points for opportunity areas and proximity to transit, their QAP does not explicitly define these categories. Developers must show

that the projects are in “close proximity to public transportation, [are] located in a community with a low incidence of crime, [and are] serviced by high performing schools...” (2013, p.19) but there are no definitions to determine these categories. What is “close” proximity to transit? How are “high performing schools” measured and defined?

Finally, the study found that many QAPs, including Nevada’s, require letters of support from local units of government or have point categories that incentivize receiving such support. This practice may cause fair housing issues insofar as requiring local support or recommendation could potentially have a “discriminatory influence on the location of affordable housing” (GAO, 2016, p. 2). In many communities, affordable housing is a tremendously contentious issue and requiring local support can give great power to NIMBY (Not in My Back Yard) opposition. Residents may not support market-rate multi-family projects—let alone subsidized housing—thereby confining such developments to communities with elected officials who are willing to support a potentially politically controversial project.

Conclusion

Developers closely consider point categories when selecting sites and planning new LIHTC housing, often finely tuning their projects in order to meet states’ QAP criteria to receive funding. This therefore gives HFAs significant power and responsibility in influencing the location of LIHTC developments. But even as developers succeed in meeting the necessary QAP point thresholds for LIHTC funding, few HFAs have successfully encouraged these same developers to propose and build LIHTC housing in low-poverty, high-opportunity areas. And indeed, without deliberate planning, data analysis, and location-based point-categories, it is nearly impossible for HFAs to encourage affordable housing in these highest opportunity areas.

Ultimately, however, it should be noted that the focus of this research is not to argue that HFAs should never invest in high-poverty, minority communities. In fact, strategic investments in these locations can have a transformative impact on neighborhoods. But low-income residents have the right to real and meaningful choices in their housing options. Without a significant shift in affordable housing policies, particularly QAPs which control the largest funding source for affordable housing, HFAs will continue to invest in housing policies that unintentionally segregate and perpetuate cycles of poverty.

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Appendix A: All LIHTC Projects by State

State	State Population	Number of LIHTC Projects	Proportion of LIHTC Projects to Population
Alabama	4830620	777	0.00016
Alaska	733375	96	0.00013
Arizona	6641928	430	0.00006
Arkansas	2958208	589	0.00020
California	38421464	3777	0.00010
Colorado	5278906	559	0.00011
Connecticut	3593222	332	0.00009
Delaware	926454	141	0.00015
Florida	19645772	1307	0.00007
Georgia	10006693	1037	0.00010
Hawaii	1406299	87	0.00006
Idaho	1616547	234	0.00014
Illinois	12873761	1336	0.00010
Indiana	6568645	1040	0.00016
Iowa	3093526	652	0.00021
Kansas	2892987	608	0.00021
Kentucky	4397353	787	0.00018
Louisiana	4625253	965	0.00021
Maine	1329100	279	0.00021
Maryland	5930538	708	0.00012
Massachusetts	6705586	880	0.00013
Michigan	9900571	1394	0.00014
Minnesota	5419171	960	0.00018
Mississippi	2988081	817	0.00027
Missouri	6045448	1713	0.00028
Montana	1014699	209	0.00021
Nebraska	1869365	488	0.00026
Nevada	2798636	271	0.00010
New Hampshire	1324201	214	0.00016
New Jersey	8904413	627	0.00007
New Mexico	2084117	311	0.00015
New York	19673174	3254	0.00017
North Carolina	9845333	2026	0.00021
North Dakota	721640	179	0.00025
Ohio	11575977	1853	0.00016
Oklahoma	3849733	531	0.00014
Oregon	3939233	662	0.00017
Pennsylvania	12779559	1719	0.00013

Rhode Island	1053661	167	0.00016
South Carolina	4777576	698	0.00015
South Dakota	843190	273	0.00032
Tennessee	6499615	956	0.00015
Texas	26538614	2373	0.00009
Utah	2903379	408	0.00014
Vermont	626604	279	0.00045
Virginia	8256630	1025	0.00012
Washington	6985464	1052	0.00015
West Virginia	1851420	290	0.00016
Wisconsin	5742117	1080	0.00019
Wyoming	579679	103	0.00018

Appendix B: All LIHTC Projects by Low-Poverty Municipalities

City Name	State	Poverty Rate %	Population	Number of LIHTC Projects per city	LIHTC projects per capita in low-poverty municipalities	Total Statewide LIHTC projects per capita
Hoover city, Alabama	Alabama	6	83547	0		
Madison city, Alabama	Alabama	6.7	45590	5		
Vestavia Hills city, Alabama	Alabama	4.3	34116	0	0.00003	0.00016
Badger CDP, Alaska	Alaska	4.5	21197	0		
Juneau city and borough, Alaska	Alaska	6.6	32531	7		
Lakes CDP, Alaska	Alaska	7.3	9028	0	0.00011	0.00013
Catalina Foothills CDP, Arizona	Arizona	6	50940	0		
Gilbert town, Arizona	Arizona	6.6	230781	3		
Oro Valley town, Arizona	Arizona	5.6	41965	0	0.00001	0.00006
Bella Vista city, Arkansas	Arkansas	4.8	27606	0		
Bentonville city, Arkansas	Arkansas	7.7	40368	12		
Bryant city, Arkansas	Arkansas	4.1	19162	5	0.00020	0.00020
Yorba Linda city, California	California	3.6	67033	4		
Cupertino city, California	California	3.7	60171	0		
Dublin city, California	California	4	52063	6		
San Ramon city, California	California	4.2	74571	4		
Pleasanton city, California	California	4.4	75009	1		
Redondo Beach city, California	California	4.7	67695	2		
Folsom city, California	California	4.7	74156	5		
Palo Alto city, California	California	5.4	66478	10		
Mission Viejo city, California	California	5.4	95979	2		
Livermore city, California	California	5.7	85286	7		
Eastvale city, California	California	5.9	56275	0		
Walnut Creek city, California	California	5.9	66799	7		
Simi Valley city, California	California	6.1	126103	8		
Fremont city, California	California	6.1	225221	17		

Thousand Oaks city, California	California	6.2	128565	9		
Camarillo city, California	California	6.4	66445	7		
Chino Hills city, California	California	6.5	76796	2		
Laguna Niguel city, California	California	6.6	64825	0		
Diamond Bar city, California	California	7	56471	0		
Temecula city, California	California	7	107153	5		
Torrance city, California	California	7	147589	3		
Newport Beach city, California	California	7.1	86911	2		
Brentwood city, California	California	7.3	55490	8		
Castro Valley CDP, California	California	7.4	62044	2		
Lake Forest city, California	California	7.4	79928	0		
Sunnyvale city, California	California	7.5	148178	1		
San Mateo city, California	California	7.6	101335	6		
Novato city, California	California	7.7	54133	7		
Santee city, California	California	7.8	56255	2		
South San Francisco city, California	California	7.8	66217	5		
Mountain View city, California	California	7.8	77973	12		
Hacienda Heights CDP, California	California	7.9	55158	2		
Lakewood city, California	California	7.9	81173	1	0.00005	0.00010
Highlands Ranch CDP, Colorado	Colorado	3.6	104432	2		
Centennial city, Colorado	Colorado	5	106604	0		
Castle Rock town, Colorado	Colorado	5.2	52143	5		
Broomfield city, Colorado	Colorado	6.5	60699	3	0.00003	0.00011
Milford city (balance), Connecticut	Connecticut	6.7	51643	1		
Stratford CDP, Connecticut	Connecticut	7.9	52316	0		
Shelton city, Connecticut	Connecticut	5.1	40783	0	0.00001	0.00009
Middletown town, Delaware	Delaware	5.4	19744	5		
Glasgow CDP, Delaware	Delaware	6.5	14640	0		
Hockessin CDP, Delaware	Delaware	2.8	13230	0	0.00011	0.00015
The Villages CDP, Florida	Florida	4.8	66083	0		
Palm Beach Gardens city, Florida	Florida	6.5	50977	1		

Weston city, Florida	Florida	7.2	68423	1		
Coral Gables city, Florida	Florida	7.6	50059	0	0.00001	0.00007
Johns Creek city, Georgia	Georgia	4.7	82203	1		
Alpharetta city, Georgia	Georgia	6.4	62054	1		
Milton city, Georgia	Georgia	5.2	35799	0	0.00001	0.00010
East Honolulu CDP, Hawaii	Hawaii	3.9	48092	0		
Pearl City CDP, Hawaii	Hawaii	5.7	47021	4		
Kailua CDP (Honolulu County), Hawaii	Hawaii	5.1	38722	5	0.000067	0.000062
Eagle city, Idaho	Idaho	5.1	21863	1		
Hayden city, Idaho	Idaho	5.9	13749	3		
Hailey city, Idaho	Idaho	7.6	8002	9	0.00030	0.00014
Arlington Heights village, Illinois	Illinois	4.6	75802	0		
Naperville city, Illinois	Illinois	4.8	145058	7		
Orland Park village, Illinois	Illinois	5.1	58273	1		
Hoffman Estates village, Illinois	Illinois	5.2	52271	1		
Mount Prospect village, Illinois	Illinois	5.2	54710	2		
Schaumburg village, Illinois	Illinois	6	74559	1		
Wheaton city, Illinois	Illinois	6.9	53585	0		
Des Plaines city, Illinois	Illinois	7.4	58930	0	0.00002	0.00009
Fishers town, Indiana	Indiana	3.2	83177	1		
Carmel city, Indiana	Indiana	3.9	85367	1		
Noblesville city, Indiana	Indiana	6.9	58013	8	0.00004	0.00016
Ankeny city, Iowa	Iowa	7.8	51489	6		
Marion city, Iowa	Iowa	6.6	36311	3		
Urbandale city, Iowa	Iowa	5.9	42099	1	0.00008	0.00021
Overland Park city, Kansas	Kansas	5.9	181464	15		
Lenexa city, Kansas	Kansas	6.4	50412	5		
Olathe city, Kansas	Kansas	6.9	131508	18		
Shawnee city, Kansas	Kansas	7.5	64125	6	0.00010	0.00021
Jeffersontown city, Kentucky	Kentucky	7.8	26953	0		

Fort Thomas city, Kentucky	Kentucky	7.9	16326	1		
Francisville CDP, Kentucky	Kentucky	1.4	9315	0	0.00002	0.00018
Central city, Louisiana	Louisiana	6.7	27768	0		
Prairieville CDP, Louisiana	Louisiana	7.4	29721	1		
Shenandoah CDP, Louisiana	Louisiana	4.8	18874	0	0.00001	0.00021
Gorham CDP, Maine	Maine	7	6445	0		
Yarmouth CDP, Maine	Maine	7.6	5628	0		
Kennebunk CDP, Maine	Maine	6.5	5621	4	0.00023	0.00021
Bethesda CDP, Maryland	Maryland	2.7	62102	4		
Bowie city, Maryland	Maryland	3.4	56885	2		
Ellicott City CDP, Maryland	Maryland	4.4	68513	6		
Rockville city, Maryland	Maryland	6.8	64331	9		
Columbia CDP, Maryland	Maryland	7	103055	11		
Germantown CDP, Maryland	Maryland	7.4	89826	7	0.00009	0.00012
Newton city, Massachusetts	Massachusetts	5.1	87675	2		
Weymouth Town city, Massachusetts	Massachusetts	6.9	55304	4		
Arlington CDP, Massachusetts	Massachusetts	5	44128	1	0.00004	0.00013
Rochester Hills city, Michigan	Michigan	5.5	72643	3		
Livonia city, Michigan	Michigan	5.8	95312	0		
Novi city, Michigan	Michigan	6.5	57577	0		
Troy city, Michigan	Michigan	6.9	82542	2		
Royal Oak city, Michigan	Michigan	7.3	58689	1	0.00002	0.00014
Woodbury city, Minnesota	Minnesota	3.5	65667	4		
Eden Prairie city, Minnesota	Minnesota	5	62626	4		
Maple Grove city, Minnesota	Minnesota	5.1	65687	6		
Minnnetonka city, Minnesota	Minnesota	5.4	51249	4		
Lakeville city, Minnesota	Minnesota	5.5	58592	6		
Blaine city, Minnesota	Minnesota	5.8	60224	3		
Plymouth city, Minnesota	Minnesota	5.8	73896	5		
Eagan city, Minnesota	Minnesota	7	65424	4		

Apple Valley city, Minnesota	Minnesota	7.5	50309	3	0.00007	0.00018
Brandon city, Mississippi	Mississippi	7	22897	2		
Madison city, Mississippi	Mississippi	3.5	25167	0		
Olive Branch city, Mississippi	Mississippi	7.2	35018	1	0.00004	0.00027
St. Peters city, Missouri	Missouri	3.8	55135	7		
O'Fallon city, Missouri	Missouri	4.6	83053	13		
Lee's Summit city, Missouri	Missouri	6.5	93618	5	0.00011	0.00028
Wilsall CDP, Montana	Montana	2.9	3990	0		
Winnett town, Montana	Montana	7.3	4125	1		
Woods Bay CDP, Montana	Montana	6.3	6692	0	0.00007	0.00021
Abie village, Nebraska	Nebraska	4.2	19463	0		
Amherst village, Nebraska	Nebraska	7.4	16895	0		
Ashton village, Nebraska	Nebraska	5.9	11258	0	0.00000	0.00026
Summerlin South CDP, Nevada	Nevada	6.9	25338	0		
Spanish Springs CDP, Nevada	Nevada	4.5	15789	0		
Spring Creek CDP, Nevada	Nevada	4.2	13564	0	0.00000	0.00010
Portsmouth city, New Hampshire	New Hampshire	6.6	21426	9		
Londonderry CDP, New Hampshire	New Hampshire	3.6	10729	1		
Hampton CDP, New Hampshire	New Hampshire	5.3	9338	1	0.00027	0.00016
Toms River CDP, New Jersey	New Jersey	6.1	88687	2		
Sayreville borough, New Jersey	New Jersey	6.6	44051	1		
Fair Lawn borough, New Jersey	New Jersey	5.1	33164	0	0.00002	0.00007
Adelino CDP, New Mexico	New Mexico	6.6	11815	0		
Algodones CDP, New Mexico	New Mexico	7.1	8455	0		
Angel Fire village, New Mexico	New Mexico	3.6	6034	0	0.00000	0.00015
Levittown CDP, New York	New York	3	51593	0		
West Seneca CDP, New York	New York	6.7	45089	0		
West Babylon CDP, New York	New York	5.7	42664	0	0.00000	0.00012
Huntersville town, North Carolina	North Carolina	5.1	50433	2		
Cary town, North Carolina	North Carolina	6.3	151186	30		

Apex town, North Carolina	North Carolina	4.6	42220	3	0.00014	0.00021
Dickinson city, North Dakota	North Dakota	7.1	21097	8		
West Fargo city, North Dakota	North Dakota	7.1	29892	19		
Alice city, North Dakota	North Dakota	6.3	3728	0	0.00049	0.00025
Mentor city, Ohio	Ohio	6.8	46952	0		
Beavercreek city, Ohio	Ohio	5.2	45999	0		
Strongsville city, Ohio	Ohio	4.1	44649	0	0.00000	0.00016
Bixby city, Oklahoma	Oklahoma	6.7	23171	2		
Owasso city, Oklahoma	Oklahoma	7.9	32650	3		
Yukon city, Oklahoma	Oklahoma	7.1	24746	3	0.00010	0.00014
Bethany CDP, Oregon	Oregon	2.5	22346	0		
Lake Oswego city, Oregon	Oregon	7.3	37628	2		
West Linn city, Oregon	Oregon	4.8	25963	0	0.00002	0.00017
Levittown CDP, Pennsylvania	Pennsylvania	5.9	51805	1		
Bethel Park municipality, Pennsylvania	Pennsylvania	4.4	32322	0		
Plum borough, Pennsylvania	Pennsylvania	4.4	27458	0	0.00001	0.00013
Warwick city, Rhode Island	Rhode Island	7	81855	3		
Cumberland Hill CDP, Rhode Island	Rhode Island	4.5	8439	0		
Greenville CDP, Rhode Island	Rhode Island	3.8	8419	0	0.00003	0.00016
Blythewood town, South Carolina	South Carolina	7.3	19706	0		
Mauldin city, South Carolina	South Carolina	6.5	24396	1		
Mount Pleasant town, South Carolina	South Carolina	7.4	74952	0	0.00001	0.00015
Alcester city, South Dakota	South Dakota	6.8	9497	0		
Anderson CDP, South Dakota	South Dakota	4.3	8516	0		
Aurora town, South Dakota	South Dakota	3.6	4427	1	0.00004	0.00032
Bartlett city, Tennessee	Tennessee	5.7	58107	2		
Hendersonville city, Tennessee	Tennessee	6.6	54168	5		
Franklin city, Tennessee	Tennessee	6.9	68549	2	0.00005	0.00015
Flower Mound town, Texas	Texas	2.7	68654	0		
Frisco city, Texas	Texas	3.6	137797	3		

Pearland city, Texas	Texas	4.5	101725	2		
The Woodlands CDP, Texas	Texas	4.6	105713	3		
Cedar Park city, Texas	Texas	4.9	60841	5		
Missouri City city, Texas	Texas	5.2	70538	3		
Sugar Land city, Texas	Texas	5.3	84268	0		
Allen city, Texas	Texas	5.5	92502	1		
League City city, Texas	Texas	5.6	91665	4		
Atascocita CDP, Texas	Texas	6.1	70773	0		
Mansfield city, Texas	Texas	6.2	61559	3		
Rowlett city, Texas	Texas	6.8	58296	0		
McKinney city, Texas	Texas	7.4	150064	13		
Plano city, Texas	Texas	7.5	275645	5		
North Richland Hills city, Texas	Texas	7.7	66950	4	0.00003	0.00009
South Jordan city, Utah	Utah	3.5	59662	1		
Lehi city, Utah	Utah	5.7	54079	2		
Sandy city, Utah	Utah	6.7	91533	3	0.00003	0.00014
Albany village, Vermont	Vermont	6.7	18536	0		
Concord CDP, Vermont	Vermont	7.8	9709	0		
Danville CDP, Vermont	Vermont	7	2238	0	0.00000	0.00045
Centreville CDP, Virginia	Virginia	5	73660	4		
Reston CDP, Virginia	Virginia	7.3	60112	6		
Dale City CDP, Virginia	Virginia	7.3	72130	0	0.00005	0.00012
Sammamish city, Washington	Washington	2.9	50163	0		
Kirkland city, Washington	Washington	6.3	84721	5		
Redmond city, Washington	Washington	7.1	57959	5		
Bellevue city, Washington	Washington	7.9	134630	14	0.00007	0.00015
Arbovale CDP, West Virginia	West Virginia	6.8	13848	0		
Barboursville village, West Virginia	West Virginia	3.6	8338	3		
Beaver CDP, West Virginia	West Virginia	7.9	4078	3	0.00023	0.00016
Wauwatosa city, Wisconsin	Wisconsin	6.4	47126	1		
New Berlin city, Wisconsin	Wisconsin	3.8	39774	5		

Brookfield city, Wisconsin	Wisconsin	3.5	38000	2	0.00006	0.00019
Alta CDP, Wyoming	Wyoming	3.1	6138	0		
Antelope Valley-Crestview CDP, Wyoming	Wyoming	4.8	2692	0		
Auburn CDP, Wyoming	Wyoming	2.2	2634	0	0.00000	0.00018

Appendix C: 2010-2014 LIHTC Projects by Low-Poverty Municipalities

City Name	State	Poverty Rate %	Population	Number of LIHTC Projects per city 2010-2014	LIHTC per capita in low-poverty cities in State	Total Statewide LIHTC Projects 2010-2014	Statewide LIHTC per capita
Hoover city, Alabama	Alabama	6	83547	0			
Madison city, Alabama	Alabama	6.7	45590	1			
Vestavia Hills city, Alabama	Alabama	4.3	34116	0	0.000006	53	0.000011
Badger CDP, Alaska	Alaska	4.5	21197	0			
Juneau city and borough, Alaska	Alaska	6.6	32531	0			
Lakes CDP, Alaska	Alaska	7.3	9028	0	0.000000	14	0.000019
Catalina Foothills CDP, Arizona	Arizona	6	50940	0			
Gilbert town, Arizona	Arizona	6.6	230781	0			
Oro Valley town, Arizona	Arizona	5.6	41965	0	0.000000	66	0.000010
Bella Vista city, Arkansas	Arkansas	4.8	27606	0			
Bentonville city, Arkansas	Arkansas	7.7	40368	1			
Bryant city, Arkansas	Arkansas	4.1	19162	4	0.000057	118	0.000040
Yorba Linda city, California	California	3.6	67033	1			
Cupertino city, California	California	3.7	60171	0			
Dublin city, California	California	4	52063	1			
San Ramon city, California	California	4.2	74571	2			
Pleasanton city, California	California	4.4	75009	0			
Redondo Beach city, California	California	4.7	67695	0			
Folsom city, California	California	4.7	74156	0			
Palo Alto city, California	California	5.4	66478	4			
Mission Viejo city, California	California	5.4	95979	0			
Livermore city, California	California	5.7	85286	0			
Eastvale city, California	California	5.9	56275	0			
Walnut Creek city, California	California	5.9	66799	1			
Simi Valley city, California	California	6.1	126103	1			
Fremont city, California	California	6.1	225221	4			
Thousand Oaks city, California	California	6.2	128565	3			
Camarillo city, California	California	6.4	66445	0			

Chino Hills city, California	California	6.5	76796	0			
Laguna Niguel city, California	California	6.6	64825	0			
Diamond Bar city, California	California	7	56471	0			
Temecula city, California	California	7	107153	3			
Torrance city, California	California	7	147589	1			
Newport Beach city, California	California	7.1	86911	0			
Brentwood city, California	California	7.3	55490	1			
Castro Valley CDP, California	California	7.4	62044	0			
Lake Forest city, California	California	7.4	79928	0			
Sunnyvale city, California	California	7.5	148178	3			
San Mateo city, California	California	7.6	101335	2			
Novato city, California	California	7.7	54133	1			
Santee city, California	California	7.8	56255	2			
South San Francisco city, California	California	7.8	66217	2			
Mountain View city, California	California	7.8	77973	3			
Hacienda Heights CDP, California	California	7.9	55158	0			
Lakewood city, California	California	7.9	81173	0	0.000013	857	0.000022
Highlands Ranch CDP, Colorado	Colorado	3.6	104432	1			
Centennial city, Colorado	Colorado	5	106604	0			
Castle Rock town, Colorado	Colorado	5.2	52143	1			
Broomfield city, Colorado	Colorado	6.5	60699	0	0.000006	89	0.000017
Milford city (balance), Connecticut	Connecticut	6.7	51643	0			
Stratford CDP, Connecticut	Connecticut	7.9	52316	0			
Shelton city, Connecticut	Connecticut	5.1	40783	0	0.000000	30	0.000008
Middletown town, Delaware	Delaware	5.4	19744	2			
Glasgow CDP, Delaware	Delaware	6.5	14640	0			
Hockessin CDP, Delaware	Delaware	2.8	13230	0	0.000042	24	0.000026
The Villages CDP, Florida	Florida	4.8	66083	0			
Palm Beach Gardens city, Florida	Florida	6.5	50977	0			
Weston city, Florida	Florida	7.2	68423	0			
Coral Gables city, Florida	Florida	7.6	50059	0	0.000000	195	0.000010
Johns Creek city, Georgia	Georgia	4.7	82203	1			

Alpharetta city, Georgia	Georgia	6.4	62054	0			
Milton city, Georgia	Georgia	5.2	35799	0	0.000006	180	0.000018
East Honolulu CDP, Hawaii	Hawaii	3.9	48092	0			
Pearl City CDP, Hawaii	Hawaii	5.7	47021	0			
Kailua CDP (Honolulu County), Hawaii	Hawaii	5.1	38722	1	0.000007	22	0.000016
Eagle city, Idaho	Idaho	5.1	21863	0			
Hayden city, Idaho	Idaho	5.9	13749	0			
Hailey city, Idaho	Idaho	7.6	8002	1	0.000023	40	0.000025
Arlington Heights village, Illinois	Illinois	4.6	75802	0			
Naperville city, Illinois	Illinois	4.8	145058	0			
Orland Park village, Illinois	Illinois	5.1	58273	1			
Hoffman Estates village, Illinois	Illinois	5.2	52271	0			
Mount Prospect village, Illinois	Illinois	5.2	54710	2			
Schaumburg village, Illinois	Illinois	6	74559	0			
Wheaton city, Illinois	Illinois	6.9	53585	0			
Des Plaines city, Illinois	Illinois	7.4	58930	0	0.000005	173	0.000017
Fishers town, Indiana	Indiana	3.2	83177	0			
Carmel city, Indiana	Indiana	3.9	85367	0			
Noblesville city, Indiana	Indiana	6.9	58013	2	0.000009	156	0.000024
Ankeny city, Iowa	Iowa	7.8	51489	1			
Marion city, Iowa	Iowa	6.6	36311	0			
Urbandale city, Iowa	Iowa	5.9	42099	0	0.000008	110	0.000036
Overland Park city, Kansas	Kansas	5.9	181464	0			
Lenexa city, Kansas	Kansas	6.4	50412	0			
Olathe city, Kansas	Kansas	6.9	131508	0			
Shawnee city, Kansas	Kansas	7.5	64125	0	0.000000	95	0.000033
Jeffersontown city, Kentucky	Kentucky	7.8	26953	0			
Fort Thomas city, Kentucky	Kentucky	7.9	16326	0			
Francisville CDP, Kentucky	Kentucky	1.4	9315	0	0.000019	127	0.000029

Central city, Louisiana	Louisiana	6.7	27768	0			
Prairieville CDP, Louisiana	Louisiana	7.4	29721	0			
Shenandoah CDP, Louisiana	Louisiana	4.8	18874	0	0.000000	149	0.000032
Gorham CDP, Maine	Maine	7	6445	0			
Yarmouth CDP, Maine	Maine	7.6	5628	0			
Kennebunk CDP, Maine	Maine	6.5	5621	0	0.000000	40	0.000030
Bethesda CDP, Maryland	Maryland	2.7	62102	1			
Bowie city, Maryland	Maryland	3.4	56885	0			
Ellicott City CDP, Maryland	Maryland	4.4	68513	1			
Rockville city, Maryland	Maryland	6.8	64331	1			
Columbia CDP, Maryland	Maryland	7	103055	4			
Germantown CDP, Maryland	Maryland	7.4	89826	0	0.000016	114	0.000019
Newton city, Massachusetts	Massachusetts	5.1	87675	0			
Weymouth Town city, Massachusetts	Massachusetts	6.9	55304	1			
Arlington CDP, Massachusetts	Massachusetts	5	44128	1	0.000011	167	0.000025
Rochester Hills city, Michigan	Michigan	5.5	72643	0			
Livonia city, Michigan	Michigan	5.8	95312	0			
Novi city, Michigan	Michigan	6.5	57577	0			
Troy city, Michigan	Michigan	6.9	82542	0			
Royal Oak city, Michigan	Michigan	7.3	58689	1	0.000003	172	0.000017
Woodbury city, Minnesota	Minnesota	3.5	65667	1			
Eden Prairie city, Minnesota	Minnesota	5	62626	0			
Maple Grove city, Minnesota	Minnesota	5.1	65687	1			
Minnnetonka city, Minnesota	Minnesota	5.4	51249	1			
Lakeville city, Minnesota	Minnesota	5.5	58592	1			
Blaine city, Minnesota	Minnesota	5.8	60224	1			
Plymouth city, Minnesota	Minnesota	5.8	73896	1			
Eagan city, Minnesota	Minnesota	7	65424	1			
Apple Valley city, Minnesota	Minnesota	7.5	50309	1	0.000014	118	0.000022
Brandon city, Mississippi	Mississippi	7	22897	0			
Madison city, Mississippi	Mississippi	3.5	25167	0			

Olive Branch city, Mississippi	Mississippi	7.2	35018	0	0.000000	105	0.000035
St. Peters city, Missouri	Missouri	3.8	55135	3			
O'Fallon city, Missouri	Missouri	4.6	83053	4			
Lee's Summit city, Missouri	Missouri	6.5	93618	1	0.000035	130	0.000022
Wilsall CDP, Montana	Montana	2.9	3990	0			
Winnett town, Montana	Montana	7.3	4125	0			
Woods Bay CDP, Montana	Montana	6.3	6692	0	0.000000	29	0.000029
Abie village, Nebraska	Nebraska	4.2	19463	0			
Amherst village, Nebraska	Nebraska	7.4	16895	0			
Ashton village, Nebraska	Nebraska	5.9	11258	0	0.000000	76	0.000041
Summerlin South CDP, Nevada	Nevada	6.9	25338	0			
Spanish Springs CDP, Nevada	Nevada	4.5	15789	0			
Spring Creek CDP, Nevada	Nevada	4.2	13564	0	0.000000	44	0.000016
Portsmouth city, New Hampshire	New Hampshire	6.6	21426	1			
Londonderry CDP, New Hampshire	New Hampshire	3.6	10729	0			
Hampton CDP, New Hampshire	New Hampshire	5.3	9338	0	0.000024	31	0.000023
Toms River CDP, New Jersey	New Jersey	6.1	88687	0			
Sayreville borough, New Jersey	New Jersey	6.6	44051	1			
Fair Lawn borough, New Jersey	New Jersey	5.1	33164	0	0.000006	245	0.000028
Adelino CDP, New Mexico	New Mexico	6.6	11815	0			
Algodones CDP, New Mexico	New Mexico	7.1	8455	0			
Angel Fire village, New Mexico	New Mexico	3.6	6034	0	0.000000	12	0.000006
Levittown CDP, New York	New York	3	51593	0			
West Seneca CDP, New York	New York	6.7	45089	0			
West Babylon CDP, New York	New York	5.7	42664	0	0.000000	145	0.000013
Huntersville town, North Carolina	North Carolina	5.1	50433	0			

Cary town, North Carolina	North Carolina	6.3	151186	2			
Apex town, North Carolina	North Carolina	4.6	42220	0	0.000008	311	0.000032
Dickinson city, North Dakota	North Dakota	7.1	21097	2			
West Fargo city, North Dakota	North Dakota	7.1	29892	2			
Alice city, North Dakota	North Dakota	6.3	3728	0	0.000073	22	0.000030
Mentor city, Ohio	Ohio	6.8	46952	0			
Beavercreek city, Ohio	Ohio	5.2	45999	0			
Strongsville city, Ohio	Ohio	4.1	44649	0	0.000000	238	0.000021
Bixby city, Oklahoma	Oklahoma	6.7	23171	0			
Owasso city, Oklahoma	Oklahoma	7.9	32650	0			
Yukon city, Oklahoma	Oklahoma	7.1	24746	0	0.000000	68	0.000018
Bethany CDP, Oregon	Oregon	2.5	22346	0			
Lake Oswego city, Oregon	Oregon	7.3	37628	1			
West Linn city, Oregon	Oregon	4.8	25963	0	0.000012	84	0.000021
Levittown CDP, Pennsylvania	Pennsylvania	5.9	51805	0			
Bethel Park municipality, Pennsylvania	Pennsylvania	4.4	32322	0			
Plum borough, Pennsylvania	Pennsylvania	4.4	27458	0	0.000000	170	0.000013
Warwick city, Rhode Island	Rhode Island	7	81855	1			
Cumberland Hill CDP, Rhode Island	Rhode Island	4.5	8439	0			
Greenville CDP, Rhode Island	Rhode Island	3.8	8419	0	0.000010	33	0.000031
Blythewood town, South Carolina	South Carolina	7.3	19706	0			
Mauldin city, South Carolina	South Carolina	6.5	24396	0			
Mount Pleasant town, South Carolina	South Carolina	7.4	74952	0	0.000000	130	0.000027
Alcester city, South Dakota	South Dakota	6.8	9497	0			
Anderson CDP, South Dakota	South Dakota	4.3	8516	0			
Aurora town, South Dakota	South Dakota	3.6	4427	0	0.000000	36	0.000043

Bartlett city, Tennessee	Tennessee	5.7	58107	0			
Hendersonville city, Tennessee	Tennessee	6.6	54168	1			
Franklin city, Tennessee	Tennessee	6.9	68549	1	0.000011	144	0.000022
Flower Mound town, Texas	Texas	2.7	68654	0			
Frisco city, Texas	Texas	3.6	137797	1			
Pearland city, Texas	Texas	4.5	101725	1			
The Woodlands CDP, Texas	Texas	4.6	105713	0			
Cedar Park city, Texas	Texas	4.9	60841	1			
Missouri City city, Texas	Texas	5.2	70538	1			
Sugar Land city, Texas	Texas	5.3	84268	0			
Allen city, Texas	Texas	5.5	92502	0			
League City city, Texas	Texas	5.6	91665	0			
Atascocita CDP, Texas	Texas	6.1	70773	0			
Mansfield city, Texas	Texas	6.2	61559	0			
Rowlett city, Texas	Texas	6.8	58296	0			
McKinney city, Texas	Texas	7.4	150064	2			
Plano city, Texas	Texas	7.5	275645	2			
North Richland Hills city, Texas	Texas	7.7	66950	0	0.000005	418	0.000016
South Jordan city, Utah	Utah	3.5	59662	1			
Lehi city, Utah	Utah	5.7	54079	0			
Sandy city, Utah	Utah	6.7	91533	0	0.000005	61	0.000021
Albany village, Vermont	Vermont	6.7	18536	0			
Concord CDP, Vermont	Vermont	7.8	9709	0			
Danville CDP, Vermont	Vermont	7	2238	0	0.000000	51	0.000081
Centreville CDP, Virginia	Virginia	5	73660	0			
Reston CDP, Virginia	Virginia	7.3	60112	0			
Dale City CDP, Virginia	Virginia	7.3	72130	0	0.000000	231	0.000028
Sammamish city, Washington	Washington	2.9	50163	0			
Kirkland city, Washington	Washington	6.3	84721	2			
Redmond city, Washington	Washington	7.1	57959	0			
Bellevue city, Washington	Washington	7.9	134630	2	0.000012	168	0.000024

Arbovale CDP, West Virginia	West Virginia	6.8	13848	0			
Barboursville village, West Virginia	West Virginia	3.6	8338	1			
Beaver CDP, West Virginia	West Virginia	7.9	4078	0	0.000038	60	0.000032
Wauwatosa city, Wisconsin	Wisconsin	6.4	47126	1			
New Berlin city, Wisconsin	Wisconsin	3.8	39774	2			
Brookfield city, Wisconsin	Wisconsin	3.5	38000	0	0.000024	187	0.000033
Alta CDP, Wyoming	Wyoming	3.1	6138	0			
Antelope Valley-Crestview CDP, Wyoming	Wyoming	4.8	2692	0			
Auburn CDP, Wyoming	Wyoming	2.2	2634	0	0.000000	26	0.000045