

SPOTLIGHT ON UNDERSERVED MARKETS

Opportunity Incentives in LIHTC Qualified Allocation Plans



Opportunity Incentives in LIHTC Qualified Allocation Plans

Over the past several years there has been an increased focus on deconcentrating poverty and promoting affordable housing in high opportunity areas, particularly in research, policy and affordable housing circles. While the broad concept of high opportunity areas — those locations that, through various economic and social factors, as well as the proximity of certain amenities, encourage a positive impact on a person’s life outcome — may seem relatively straightforward, there is substantial variability in how to define opportunity areas and, in practical terms, how to best identify them and encourage the investment in affordable housing there. The trend to support affordable housing in high opportunity areas is particularly evident in states’ allocation of Low-Income Housing Tax Credit (LIHTC) dollars — a highly effective subsidy that makes affordable housing development and preservation possible — and the priorities established in their Qualified Allocation Plans (QAPs).

In this paper, we (Freddie Mac and the National Housing Trust) explore the different definitions of opportunity and the methods used to promote opportunity housing in all 50 states and the District of Columbia through the LIHTC program. In addition to analyzing each state QAP¹, we have conducted outreach to a number of state allocating agencies, developers and researchers in order to better understand the policies and the process by which states arrived at them, as well as the impact of such policies on the developer community.

We identify common themes and methods in QAPs across states, and we examine the methods used to implement these themes and the challenges to making them practical, how these methods have affected development decisions so far, and how states have chosen to monitor success over time. We find that, despite the variety of approaches to defining opportunity, five primary indicators of opportunity are commonly used by states: Access to Education, Economic Growth/Jobs, Income levels, Access to Health Care, and Access to Transportation.²

¹ For the purposes of this analysis, QAP refers to a state’s Qualified Allocation Plan and any related documents that provide additional details on selection criteria and preferences or describe other requirements, policies, and procedures relevant to Housing Credit allocation.

² These five indicators capture those most commonly used in QAPs, though some states may use indicators that fall outside this list. For a complete analysis of how individual states define opportunity, see Appendix A.

Context: Housing Credits, QAPs and the Case for Opportunity

Low-Income Housing Tax Credits (referred to as either LIHTC or Housing Credits throughout this report) are the primary subsidy available for developing and preserving affordable rental housing.³ These credits provide subsidy for millions of affordable housing units across the country, keeping rents affordable to those making 60 percent or less of the area median income (AMI).ⁱ To allocate these credits, state Housing Finance Agencies (HFAs) develop a competitive scoring system, with selection criteria outlined in the HFA's Qualified Allocation Plan (QAP) or similar documents. The policies and priorities outlined in a QAP have a significant impact on the types and location of affordable housing that is developed. The 9 percent Housing Credit program, which offers a larger economic incentive than the 4 percent Housing Credit program, is very competitive. In many states, applications for credits far exceed supply. Affordable housing developers seek to maximize their chances of securing funding by ensuring that the developments they pursue adhere closely to the priorities of the housing agency as laid out in the QAP.

QAPs are commonly updated on an annual basis to account for fluctuating housing needs across each state. As needs change, states adjust scoring incentives to meet the evolving demands for affordable housing. In recent years, there has been a deliberate effort to promote investment in affordable housing in areas with access to opportunity in the context of other affordable housing needs. Research, such as that from Harvard's Equality of Opportunity Project, demonstrates that residents living in neighborhoods with less concentrated poverty, less income inequality, better schools, a larger share of two-parent families, and lower crime rates have better life outcomes than those who do not.ⁱⁱ Many HFAs recognize that investing in affordable housing in these communities provides an opportunity to improve the lives of low-income residents, and have therefore relied on both national and local research to inform their decisions on how and where to incentivize investment and development.

To accompany the research on state QAPs included in this report, we have also briefly examined the current market of affordable housing in Federal Housing Finance Agency (FHFA) defined high opportunity areasⁱⁱⁱ. For the purposes of this market analysis, we focus only on the 19 states that FHFA has identified as meeting their criteria for defining high opportunity within their respective QAP. Using the National Housing Preservation Database, which is the most comprehensive data source for federally subsidized rental housing programs, we found that approximately 17 million people live in areas recognized by FHFA as high opportunity. Of these, approximately 788,666 families⁴ earn at or below 60 percent AMI while only 614,308 rental units in these areas are affordable to them. This means there is a total estimated current shortage of 174,358 affordable units in high opportunity areas. As more people move to these highly - desirable areas, this need will only increase. Of the 164,308 units, 104,864 units have some form of subsidy and are subject to long-term regulatory agreements – 60,474 being LIHTC units and 30,357 being Section 8 units. The remaining 509,445 are naturally occurring affordable housing, meaning they do not have any subsidies or regulatory agreements associated with them. With households needing these units exceeding supply, these units are at risk of rents rising to a point they are no longer affordable.

³ This analysis refers exclusively to the competitive 9% Housing Credit, and not the non-competitive 4% Housing credit Program. We also reviewed the most recent QAP at the time of the development of this paper.

⁴ This data is unavailable on an individual basis, family incomes are the best available estimate for market income levels within a given market.

The Role of Duty to Serve

While there are many definitions of opportunity and, more specifically, housing that supports opportunity, FHFA^{iv} has established a practical definition that can be applied nationally with local variations achieved through recognition of state-based criteria.^v The Duty to Serve regulation⁵, published in 2016, is an effort to support affordable housing in the nation's hardest to serve areas. The regulation has identified Residential Economic Diversity as a key priority, defined as: 1) affordable housing in high opportunity areas, and 2) mixed income housing in areas of concentrated poverty.

This paper focuses on the role of QAPs in furthering Residential Economic Diversity through affordable housing development in high opportunity areas. In separate Evaluation Guidance on the regulation, FHFA further clarified that a "high opportunity area" means a HUD-designated "Difficult Development Area," with a specified poverty rate cap, or an area designated in a state or local QAP, as determined by FHFA. FHFA uses the following definition to determine if a census tract qualifies as high opportunity:

"An area designated by a state or local Qualified Allocation Plan (QAP) as a high opportunity area whose poverty rate falls below 10 percent (for metropolitan areas) or below 15 percent (for non-metropolitan areas)."

The following criteria determine if a QAP qualifies under FHFA's guidance:

- 1. The definitions are intended to describe areas that provide strong opportunities for the residents of housing funded through the QAP. Use of terminology such as "high opportunity areas," "very high opportunity areas," "areas of opportunity," "opportunity areas," or "economic integration areas" (singular or plural) can be helpful in signaling this intent; and*
- 2. The QAP describes the location of the areas in sufficient detail to enable them to be mapped and/or includes a list(s) or map(s) of such high opportunity areas.^{vi}*

Using this definition, FHFA has identified 19 states that meet its definition of high opportunity areas, a list of which can be found in Exhibit A and Exhibit B below.

⁵ The Duty to Serve Regulation requires Fannie Mae and Freddie Mac to provide leadership to facilitate a secondary market for mortgages on housing for very low-, low-, and moderate income families in: manufactured housing, Affordable housing preservation, and Rural housing.
<https://www.fhfa.gov/PolicyProgramsResearch/Programs/Pages/Duty-to-Serve.aspx>

Analysis of State QAPs

In our analysis, we assessed 51 QAPs (all 50 states, plus the District of Columbia) to highlight the commonalities, differences and outliers among their definitions of opportunity.

We found that the ways in which HFAs define and measure opportunity as well as the ways in which they incentivize developers to develop and preserve affordable housing in these areas, vary greatly from state to state. Despite these various approaches, we determined there are 5 primary indicators that states use to describe and locate areas of opportunity, as described in the table below.

Five Common Indicators

<i>Access to Education</i>	Neighborhoods with access to schools and/or universities
<i>Economic Growth/Jobs</i>	Access to jobs and/or low unemployment rates within a community
<i>Income Levels</i>	High income levels and/or low poverty rates
<i>Access to Health Care</i>	Hospitals, doctors and/or health services in close proximity
<i>Access to Transportation</i>	Access to public transportation and/or shorter commute times

Examples of Each Opportunity Indicator

The ways in which these indicators are incentivized and defined varies greatly between states. However, the general purpose that each indicator serves remains consistent across states. The examples below illustrate these nuances and commonalities. For additional details or to see how other states consider individual indicators of opportunity, please refer to Appendix A.

Access to Education

- The 2017 Connecticut QAP considers a development to be within an area of opportunity if the local school district scores average or above average on the GreatSchools 2013 District Ratings. Additional incentives are available for a project site’s proximity to community/technical colleges.
- New Mexico’s 2018 QAP incentivizes development near certain amenities, including a K-12 school, university, adult education center, vocational school, or community college.

Economic Growth/Jobs

- Maryland’s 2016 QAP measures economic opportunity with a Composite Opportunity Index which is defined as “the extent to which a community provides employment opportunity and mobility to its residents.” Economic opportunity is measured, in part, by the prevailing unemployment rate obtained from the American Community Survey (ACS) 2007-2011, five-year estimate. This variable, which measures employment opportunity in a community, is inversely related to economic opportunity.

- Mississippi's 2017-2018 QAP identifies opportunity as, among other things, a combination of the following indicators from the Environmental Systems Research Institute Inc. (ESRI):
 - Median Household Income \geq 70 percent of the state's 2015 Median Household Income
 - Population Growth
 - Median Household Income Growth
 - Unemployment Rate
 - Counties that had more than 500 new hires per quarter in 2014

Income Levels

- The 2018-2019 Indiana QAP considers a development to be in an area of opportunity if, among other things, it is located within a county that is 1) at the top quartile for median household income in the state and not within a Qualified Census Tract (QCT), is any census tract, or equivalent geographic area defined by the Census Bureau, in which at least 50 percent of households have an income less than 60 percent of the Area Median Gross Income (AMGI). HUD has defined 60 percent of AMGI as 120 percent of HUD's Very Low-Income Limits (VLILs), which are based on 50 percent of area median family income, adjusted for high-cost and low-income areas^{viii}; and 2) at the bottom quartile for poverty rate in the state and not within a QCT. Poverty rates and household income will be based on the most recent data from the U.S. Census.

Access to Health Care

- South Carolina's 2017-2018 QAP incentivizes locations near certain amenities, including a pharmacy or drug store.
- Iowa's 2018 QAP considers "community health" as a component when defining areas of opportunity. Community health for a given census tract is calculated as a function of the number of residents without health insurance and low food access ranking by the USDA.
- The Texas 2018 QAP considers proximity to certain amenities within its Opportunity Index. Among other requirements, an area of opportunity is defined as within 3 miles of a health-related facility, such as a full-service hospital, community health center, minor emergency center, emergency room, or urgent care facility. Physician offices and physician specialty offices are not considered in this category.

Access to Transportation

- The 2018 Nevada QAP incentivizes development in certain counties (Clark and Washoe) that are within $\frac{1}{4}$ mile of a local transit route or school bus stop (school bus stop is not applicable for Senior Housing projects), while in all other counties, the development must be within $\frac{1}{2}$ mile of a local transit route or school bus stop (again, school bus stop is not applicable for Senior Housing projects) to qualify for the same incentive.
- Washington State's 2018 QAP awards points to projects that are located within a 10-minute walking distance of Fixed Transit Infrastructure and located in an area zoned for high-capacity transit supported density. The QAP also provides a map to locate properties that fit this definition.

What Do States Mean by Opportunity?

Because states have varying housing needs, demographics, economic markets and political climates, a universally agreed upon definition of opportunity does not exist. As such, we found that the definition of and metrics used to measure opportunity vary greatly between states.

HFAs have unique and independent methods for allocating credits to opportunity areas within their states. Our goal was to determine which states are emphasizing the furtherance of opportunity in their QAPs and what are the leading indicators they used to do so. To do this, we examined each state's current QAP^{6 7} as it relates to the competitive 9 percent Housing Credit program.⁸

It is of course possible for a state to incentivize opportunity in ways outside of the five indicators that we have found to be most common. For specifics on the exact indicators used by each state, please see Appendix A and the accompanying State Opportunity Incentive Briefs that summarize each state's QAP incentives for opportunity. Additionally, we found a clear difference between states providing an explicit incentive for developing or preserving affordable housing in opportunity areas, and those incentivizing individual indicators of opportunity without a direct reference to opportunity. The below methodology was used to account for these nuances:

Explicit incentive: directly references and defines opportunity

Implicit incentive: includes qualifying criteria for which indicators of opportunity – such as access to education, jobs, etc. – are incentivized without a direct reference to opportunity or the importance of locating affordable housing near these communities

We employed a similar methodology when evaluating individual indicators: If an indicator was found within a direct definition of opportunity, this would be considered an explicit indicator of opportunity. For example, Washington, D.C.'s 2017 QAP defines "Placed-Based Opportunity" as developments within quality education areas or developments with access to local jobs. Therefore, those two indicators (Access to Education and Economic Growth/Jobs) would be considered explicit as they are within the definition of opportunity. If the incentive were found outside of a definition of opportunity, this would be an implicit designation. On the other hand, Washington, D.C. also has a "Preventive Health Care" incentive, which encourages properties to partner with existing organizations such as medical clinics, universities, or healthcare organizations to provide screenings. While access to healthcare is an indicator of opportunity as identified in this report, because this indicator is found outside of the QAP's definition of opportunity, this would be considered an implicit indicator. Exhibit A classifies each state and each indicator as being either implicit or explicit. In the table, filled-in circles represent an explicit indicator and hollow circles represent an implicit indicator. Recognizing that explicit and implicit indicators are not mutually exclusive, in cases where a state included both an implicit and explicit preference for an indicator, we only included the explicit preference in the table. This is true for tables in this paper and the State Opportunity Incentive Briefs in Appendix A. However, all mentions of opportunity were identified in full text included in each State Opportunity Incentive Brief.

⁶ QAPs are updated annually. Please refer to Exhibit A and B to see which specific QAP was analyzed in each state.

⁷ It is important to note that we reviewed documents that may accompany a QAP. For instance, many states do not include scoring metrics inside their QAP but have a separate document that lays out the various points a developer may receive for their project. This is often a separate file or document. For the purposes of this report, "QAP" refers to the QAP itself and any accompanying documents.

⁸ This report does not examine the 4% Housing Credit program.

Exhibit A: Opportunity Indicators Found in QAPs^{9, 10, 11}

QAP Review			Opportunity Indicators											
State	QAP Year	Does FHFA identify this state as qualifying under Duty to Serve?	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Total # of Explicit Indicators	Explicit Percent of Maximum Possible	Total # of Implicit Indicators	Implicit Percent of Maximum Possible	Total Indicators (Implicit + Explicit)	Total Percent of Maximum Possible	Is the definition of opportunity Explicit or Implicit?
Alabama	2018	No			o	o		0	0%	2	40%	2	40%	Implicit
Alaska	2016	No		•	•			2	40%	0	0%	2	40%	Explicit
Arizona	2018	No	o		o	o	o	0	0%	4	80%	4	80%	Implicit
Arkansas	2018	No	o	•	o		o	1	20%	3	60%	4	80%	Explicit
California	2017	Yes	•	•	•	•	•	5	100%	0	0%	5	100%	Explicit
Colorado	2018	No	o		o	o	o	0	0%	4	80%	4	80%	Implicit
Connecticut	2017	Yes	•	•	•		o	3	60%	1	20%	4	80%	Explicit
Delaware	2018	Yes	•			o	o	1	20%	2	40%	3	60%	Explicit
District of Columbia	2017	Yes	o	o	•		o	1	20%	3	60%	4	80%	Explicit
Florida	2018	Yes	•	•	•	o	o	3	60%	2	40%	5	100%	Explicit
Georgia	2018	No	•	•	•	o		3	60%	1	20%	4	80%	Explicit
Hawaii	2018	No	o	o			o	0	0%	3	60%	3	60%	Implicit
Idaho	2018	No	o	o		o	o	0	0%	4	80%	4	80%	Implicit
Illinois	2018-2019	Yes	•	•	•	•	o	4	80%	1	20%	5	100%	Explicit
Indiana	2019-2019	Yes	•	•	•	•	o	4	80%	1	20%	5	100%	Explicit
Iowa	2018	Yes	•	•	•	•	•	5	100%	0	0%	5	100%	Explicit
Kansas	2018	No	o	o		o	o	0	0%	4	80%	4	80%	Implicit
Kentucky	2017-2018	No	o	o	o		o	0	0%	4	80%	4	80%	Implicit
Louisiana	2017	Yes	o		o	o	o	0	0%	4	80%	4	80%	Implicit
Maine	2018	Yes		o	•		o	1	20%	2	40%	3	60%	Explicit
Maryland	2016	Yes	•	•	•		o	3	60%	1	20%	4	80%	Explicit
Massachusetts	2017	No	•	•	•	•	•	5	100%	0	0%	5	100%	Explicit
Michigan	2017-2018	No		•			•	2	40%	0	0%	2	40%	Explicit
Minnesota	2017	Yes		•	•		o	2	40%	1	20%	3	60%	Explicit
Mississippi	2017-2018	Yes	•	•	•	o		3	60%	1	20%	4	80%	Explicit
Missouri	2018	No	•	•	•		•	4	80%	0	0%	4	80%	Explicit
Montana	2018	No	o			o	o	0	0%	3	60%	3	60%	Implicit
Nebraska	2018	No	o	o		o		0	0%	3	60%	3	60%	Implicit
Nevada	2018	No				o	o	0	0%	2	40%	2	40%	Implicit

⁹ QAP year represents the most recent available QAP at the time of our review

¹⁰ o = Implicit Indicator of Opportunity

• = Explicit Indicator of Opportunity

¹¹ In cases where a state included both an explicit and implicit preference for a certain indicator, the explicit indicator trumps the implicit as viewed in the table. However, in the accompanying State Opportunity Incentive Briefs in Appendix A, all mentions of opportunity are captured through text.

Exhibit A (Continued): Opportunity Indicators Found in QAPs

QAP Review			Opportunity Indicators											
State	QAP Year	Does FHFA identify this state as qualifying under Duty to Serve?	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Total # of Explicit Indicators	Explicit Percent of Maximum Possible	Total # of Implicit Indicators	Implicit Percent of Maximum Possible	Total Indicators (Implicit + Explicit)	Total Percent of Maximum Possible	Is the definition of opportunity Explicit or Implicit?
New Hampshire	2018	No					o	0	0%	1	20%	1	20%	Implicit
New Jersey	2017	No	o	o		o	o	0	0%	4	80%	4	80%	Implicit
New Mexico	2018	No	o			o	o	0	0%	3	60%	3	60%	Implicit
New York	2017	No	•		•			2	40%	0	0%	2	40%	Explicit
North Carolina	2018	No	o		o	o		0	0%	3	60%	3	60%	Implicit
North Dakota	2018	No						0	0%	0	0%	0	0%	N/A
Ohio	2018	Yes	•	•	•	•	•	5	100%	0	0%	5	100%	Explicit
Oklahoma	2018	No			•			1	20%	0	0%	1	20%	Explicit
Oregon	2016	Yes	•	•	•	o	o	3	60%	2	40%	5	100%	Explicit
Pennsylvania	2017-2018	No	•	•	•	•	o	4	80%	1	20%	5	100%	Explicit
Rhode Island	2018	No	o	o		o	o	0	0%	4	80%	4	80%	Implicit
South Carolina	2017-2018	No	o			o	o	0	0%	3	60%	3	60%	Implicit
South Dakota	2017	Yes	•	•	•			3	60%	0	0%	3	60%	Explicit
Tennessee	2017	No		o				0	0%	1	20%	1	20%	Implicit
Texas	2018	No	•		•	•	•	4	80%	0	0%	4	80%	Explicit
Utah	2018	Yes	•	•	•		o	3	60%	1	20%	4	80%	Explicit
Vermont	2018	No					o	0	0%	1	20%	1	20%	Implicit
Virginia	2018	Yes			o			0	0%	1	20%	1	20%	Implicit
Washington	2018	Yes	•	•	•	•	•	5	100%	0	0%	5	100%	Explicit
West Virginia	2018	No	•	•	•		•	4	80%	0	0%	4	80%	Explicit
Wisconsin	2018	No	•	•	•	•		4	80%	0	0%	4	80%	Explicit
Wyoming	2018	No	o	o	o	o	o	0	0%	5	100%	5	100%	Implicit
Explicit Total			22	23	26	10	9	90						Explicit: 29
Explicit Percentage			56%	68%	74%	33%	24%		53%					56.86%
Implicit Total			17	11	9	20	29			86				Implicit: 21
Implicit Percentage			44%	32%	26%	67%	76%				47%			41.18%
Total Count	-	19 Qualifying	39	34	35	30	38					176		N/A: 1
Total Percentage	-	37%	76%	67%	69%	59%	75%						69% **	1.96%

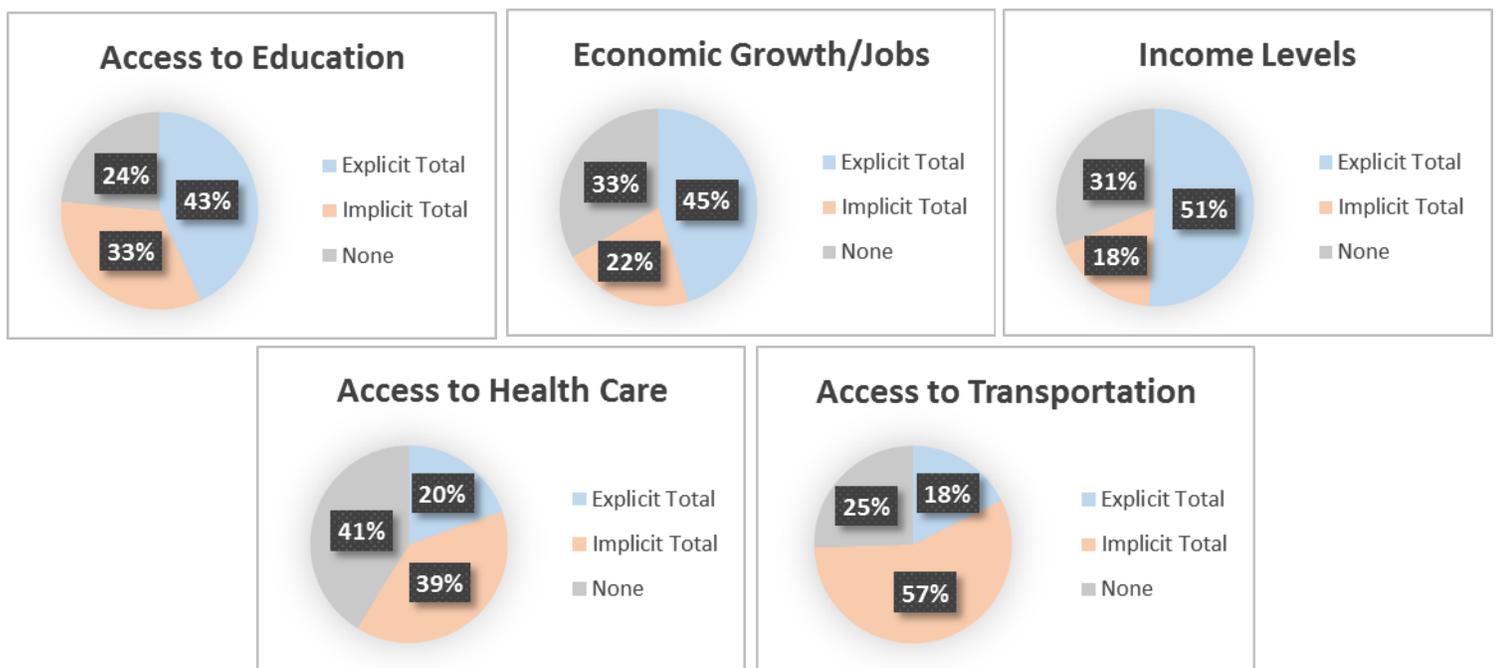
**Percentage of 255 possible indicators

Primary Takeaways

It is clear from our analysis that while many states agree on common themes and specific indicators of opportunity, there is not a universal acceptance of what defines an area of opportunity. For example, while 50 of the QAPs examined include some form of incentive for opportunity, no indicator is present across all 51 QAPs. Access to education was the most commonly used indicator, found across 39 QAPs. In reviewing the above table, 28 states explicitly identify opportunity in their QAP while 21 states implicitly identify opportunity. One QAP reviewed provided no incentive, either implicit or explicit, for opportunity. The graphics below provide additional clarity on these numbers. Due to the nuances that exist between each state, it is important to look at their incentives and the criteria for which they incent in greater detail. To that end, we have published 51 supplements to this paper (State Opportunity Incentive Briefs) in which we summarize each state QAP’s treatment of opportunity. See the State Opportunity Incentive Briefs in Appendix A.

Summary of Opportunity Indicators						
	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Total Opportunity Indicators
Explicit Total	22	23	26	10	9	90
Implicit Total	17	11	9	20	29	86
None	12	17	16	21	13	n/a

It is important to view these indicators both in raw numbers as well a part of the whole picture. The charts below show the percentage of implicit or explicit preferences that we found for each indicator.



Varying Definitions

In an attempt to summarize an extraordinarily large amount of information into a very simplistic form, there are certain nuances that may have been lost in our analysis. In addition to states using indicators that fall outside of the five we've identified as most common, we recognize that these indicators can be and often are measured and incentivized in very different ways. For example, we found that many states provide an incentive for locating affordable housing near schools only for family developments, while an incentive for locating near health care may only be available for senior developments. We also recognize that there are varying geographic distinctions that make these definitions even more variable, with the primary distinction being rural areas versus urban areas. Lastly, different QAPs often use different metrics and datasets to measure the same broad indicator. For example, while both Connecticut and Indiana consider education in their explicit definitions of opportunity, their approaches vary drastically: Connecticut incentivizes locating near schools with "average to above average ratings for school performance as evidenced by GreatSchools," while Indiana incentivizes locating "within 1 mile of a university, college, trade school, or vocational school." Despite this difference, both Connecticut and Indiana are identified in Exhibit A as explicitly considering education within their definitions of opportunity. Likely contributing to this difference in approaches, data on quality education has been difficult to find until recent years. In our outreach to state HFAs, we heard repeatedly that accessing consistent and reliable school data is a common obstacle that makes it difficult to measure quality education state wide. These statistical nuances can be found across many datasets beyond education, further illustrating the difficulties in simplifying these classifications.

To better understand the different approaches states take to defining and measuring opportunity, we've provided three brief case studies below. Ohio, Washington, D.C., and Washington State take drastically different approaches to promoting access to opportunity in their respective QAPs. This analysis does not aim to identify one approach as superior to another, but rather seeks to highlight the various methods used.

Ohio Housing Finance Agency

The Ohio Housing Finance Agency (OHFA) partnered with the Kirwan Institute for the Study of Race and Ethnicity at The Ohio State University to create an Opportunity Index that relies on a number of indicators to locate opportunity areas within the state. The index analyzes various factors that evaluate access to opportunity within communities across Ohio. The Kirwan Institute defines opportunity as, "access to economically stable and socially equitable choices in a fair and inclusive marketplace that builds value of American communities." Social opportunity is defined as, "access to equitable and inclusive choice in a market that emphasizes increasing social value." Economic opportunity is defined as, "access to fair and stable choice in a market that emphasizes increasing economic value." The Kirwan Institute used a total of 16 indicators to refine their definition over time. Within these 16 indicators are five primary opportunity categories: Transportation, Educational, Employment, Housing and Health. Through our conversations with OHFA we learned that the Housing Agency had always incentivized investing in affordable housing in high-income areas, but they started to specifically focus on the idea of opportunity in 2014. Since then, they have continuously refined their definition until their eventual partnership with the Kirwan Institute. In this case, Ohio's definition is highly nuanced and based on several factors. Ohio has made a deliberate effort to promote affordable housing in areas of opportunity and will continue to monitor their data as more developments receive credits in these areas.

D.C. Department of Housing and Community Development

Like many HFAs, the D.C. Department of Housing and Community Development (DHCD) seeks to create more affordable housing in high opportunity neighborhoods, which DHCD defines as those with characteristics such as low crime, low poverty and access to high quality schools and jobs. Another goal of this preference is to disperse the district's affordable housing supply more equitably across the city, and to provide a counterbalance to the implicit incentive for developers to build affordable housing in low-cost and high-poverty neighborhoods. In practice, DHCD uses two indicators to measure opportunity: 1) rental housing costs by census tract, and 2) homeownership housing costs by census tract. DHCD believes that homeowners and renters alike look for amenities that contribute to opportunity. High rental costs and high homeownership costs, then, serve as a proxy for the various attributes -- low crime, low poverty and access to high quality schools and jobs -- that DHCD considers as contributing to opportunity. Anecdotally, DHCD believes this approach has been effective in developing affordable housing in high opportunity neighborhoods, but they recognize that they need several more years of quantifiable data to truly measure its effects.

Washington State Housing Finance Corporation

Washington State Housing Finance Corporation (WSHFC) relies on Puget Sound Regional Council's opportunity tools to incentivize affordable housing investment in high opportunity areas, defined by a series of 20 indicators that represent five major categories of opportunity: Education, Economic Health, Housing and Neighborhood Quality, Transportation/Mobility, and Health and Environment. Like OHFA, described above, the Puget Sound Regional Council partnered with the Kirwan Institute for the Study of Race and Ethnicity. WSHFC's use of this tool, however, extends only to King County, the area including and surrounding Seattle. Within King County, the incentive for investing in affordable housing in Opportunity Areas is a single point within WSHFC's competitive scoring system. According to the Agency's Housing Credit team, developments that receive a Housing Credit allocation generally reach similar cumulative scores. Agency staff conceded that the one-point incentive on its own may not incentivize development decisions toward high opportunity areas. However, it is important to recognize that any incentive works within the context of other incentives. In Washington State, addressing housing for the homeless is a very high priority, and many of the limited Housing Credit resources are purposefully devoted toward that priority.

Mapping Opportunity Areas

In addition to defining and measuring opportunity, many HFAs explicitly identify census tracts or geographic locations within their respective states that meet these criteria. These maps and/or mapping tools help developers easily identify whether a proposed site falls within a state's definition of opportunity, which can ultimately speed the process of affordable housing development.

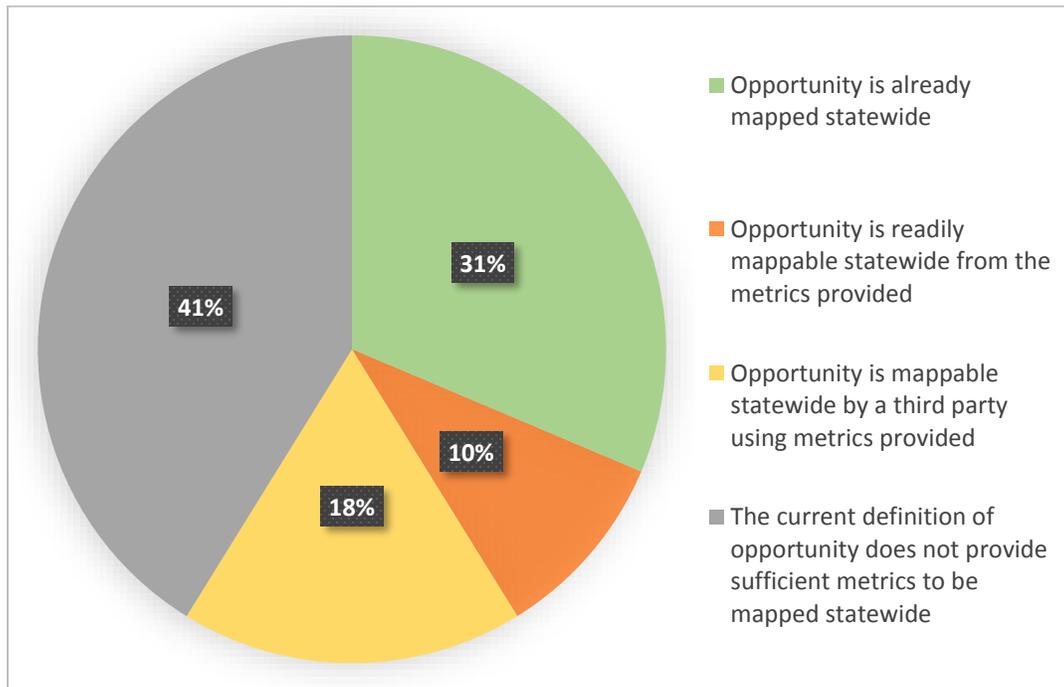
Just as we found that states employ a variety of definitions of and metrics for opportunity, we found that states' mapping features covered a similarly broad spectrum. In an effort to capture the variety of approaches, we developed several categories of mappability.

As seen in Exhibit B, we classified the mappability of each state's approach to opportunity according to the following categories, which we clarified by providing examples:¹²

- **Opportunity is already mapped statewide** – States meeting this criterion have 1) an interactive mapping tool, or 2) a visual map of opportunity and a list of census tracts that qualify as providing opportunity
 - An example of a state that meets this classification is California, which, in the 2017 QAP, partnered with UC Davis to create an opportunity index for the entire state. The index maps neighborhoods of varying levels of opportunity. It can be found [here](#).
- **Opportunity is readily mappable statewide from the metrics provided** – States meeting this criterion provide a list of census tracts that qualify but not a map of these tracts
 - Wisconsin measures opportunity with a combination of opportunity indicators: income, unemployment, schools, tribal lands and access to amenities. Wisconsin has provided a list of census tracts that qualify under its definition of opportunity within the QAP, and therefore meets this classification.
- **Opportunity is mappable statewide by a third party using metrics provided** – States meeting this criterion include quantifiable metrics that could be mapped using third-party platforms and additional datasets, such as the American Community Survey
 - Virginia has defined opportunity areas based on census tract poverty levels. It meets this classification because although the QAP does not provide a list of qualifying census tracts, it does rely on American Community Survey data which allows the user to locate qualifying census tracts based on tract poverty levels.
- **The current definition of opportunity does not provide sufficient metrics to be mapped statewide** – These states do not provide quantifiable, geographically specific information sufficient to be mapped statewide
 - The state of Wyoming has an implicit definition of opportunity based on a project's distance to a specific list of amenities. While this allows opportunity to be identified for a single project site, it does not allow for mapping opportunity on a statewide level.

In our review of all 50 states and the District of Columbia, we found 59 percent of QAPs had at least some form of mapping feature for opportunity, with 31 percent of the states already mapping opportunity across the state.

¹² FHFA uses the following criteria to evaluate a QAPs mapping features: "the QAP describes the location of the areas in sufficient detail to enable them to be mapped and/or includes a list(s) or map(s) of such high opportunity areas".



When speaking to affordable housing developers, we heard about the importance of a mapping feature, as it helped Housing Credit applicants understand where HFAs wanted to invest in affordable housing. As such, developers were able to propose projects in these areas, knowing that they had an increased chance of being awarded Housing Credits. Many developers emphasized that if the state provided access to tools that easily allow developers to identify high opportunity areas, their proposed projects would more likely align with the Agency’s priorities.

Exhibit B: Mapping Features Found in Each QAP

QAP Review			Mapping Tool			
State	QAP Year	Does FHFA identify this state as qualifying under Duty to Serve?	<i>Opportunity is already mapped statewide</i>	<i>Opportunity is readily mappable statewide from the metrics provided</i>	<i>Opportunity is mappable statewide by a third party using metrics provided</i>	<i>The current definition of opportunity does not provide sufficient metrics to be mapped statewide</i>
Alabama	2018	No			✓	
Alaska	2016	No			✓	
Arizona	2018	No				✓
Arkansas	2018	No	✓			
California	2017	Yes	✓			
Colorado	2018	No				✓
Connecticut	2017	Yes	✓			
Delaware	2018	Yes	✓			
District of Columbia	2017	Yes	✓			
Florida	2017	Yes	✓			
Georgia	2018	No	✓			
Hawaii	2018	No				✓
Idaho	2018	No				✓
Illinois	2018-2019	Yes	✓			
Indiana	2019-2019	Yes				✓
Iowa	2018	Yes	✓			
Kansas	2018	No			✓	
Kentucky	2017-2018	No			✓	
Louisiana	2017	Yes		✓		
Maine	2018	Yes		✓		
Maryland	2016	Yes	✓			
Massachusetts	2017	No			✓	
Michigan	2017-2018	No				✓
Minnesota	2017	Yes	✓			
Mississippi	2017-2018	Yes	✓			
Missouri	2018	No				✓
Montana	2018	No				✓
Nebraska	2018	No				✓
Nevada	2018	No				✓
New Hampshire	2018	No				✓
New Jersey	2017	No				✓
New Mexico	2018	No				✓
New York	2017	No			✓	
North Carolina	2018	No				✓

Exhibit B (Continued): Mapping Features Found in Each QAP

QAP Review			Mapping Tool			
State	QAP Year	Does FHFA identify this state as qualifying under Duty to Serve?	<i>Opportunity is already mapped statewide</i>	<i>Opportunity is readily mappable statewide from the metrics provided</i>	<i>Opportunity is mappable statewide by a third party using metrics provided</i>	<i>The current definition of opportunity does not provide sufficient metrics to be mapped statewide</i>
North Dakota	2018	No				✓
Ohio	2018	Yes	✓			
Oklahoma	2018	No		✓		
Oregon	2016	Yes	✓			
Pennsylvania	2017-2018	No		✓		
Rhode Island	2018	No				✓
South Carolina	2017-2018	No				✓
South Dakota	2017	Yes		✓		
Tennessee	2017	No				✓
Texas	2018	No				✓
Utah	2018	Yes	✓			
Vermont	2018	No				✓
Virginia	2018	Yes			✓	
Washington	2018	Yes	✓			
West Virginia	2018	No			✓	
Wisconsin	2018	No			✓	
Wyoming	2018	No				✓
Total Count	-	19 Qualifying	16	5	9	21
Total Percentage (out of 51)	-	37%	31%	10%	18%	41%

Challenges to Developing Affordable Housing in High Opportunity Areas

Though QAPs determine the allocation of Housing Credits, they are not the sole influencer in determining where and when properties are developed or rehabbed. While many HFAs actively promote affordable housing investment in opportunity areas, obstacles outside of the Housing Credit program can make this type of development difficult. In conversations with housing agencies and developers alike, we found the following to be the most prominent inhibitors to creating and preserving affordable housing in opportunity areas: zoning issues, local preference, rural versus urban categorizations, high costs, and lack of buildable land.

Zoning Issues

- In high opportunity areas, land may not be zoned for higher density development required for larger apartment communities.

Local Preference

- Even in cases where Housing Credits are awarded, many projects require additional local approval. If local communities oppose the development of new affordable housing projects, the awarded properties may be delayed or never built.

Rural versus Urban

- Several states have struggled with how to define and measure areas of opportunity in rural areas, where incomes may be lower and population may be generally less concentrated.

High Costs

- In high opportunity areas, land costs tend to be higher, which therefore increases the costs of acquisition and development. Additionally, in recent years, construction costs have become a limiting factor of the creation of more affordable units nationally, and can be more limiting in higher cost markets where there is limited workforce housing available for construction workers.

Lack of Buildable Land

- Many areas identified as high opportunity are already densely populated, leaving few lots available for new development. Affordable housing is often competing with other forms of development for the same, limited space.

While these can present challenges to developing affordable housing in areas with high income levels, access to health care, access to transportation, access to education, and economic growth/jobs, the clear emphasis that HFAs have placed on these indicators illustrate the important role of developing affordable housing in high opportunity areas.

Conclusion

While there are many challenges to developing affordable housing in areas that offer high income levels, economic growth, and access to health care, transportation, and education, HFAs are working to address these by prioritizing high opportunity areas within their Housing Credit programs. Such incentives are present in a majority of QAPs, though each state takes a unique approach to defining and measuring opportunity. For the vast majority of HFAs that make a deliberate and explicit effort to promote affordable housing in high opportunity areas, these incentives have been introduced in recent years. Because it generally takes 3 years to receive credits, build properties, and reach stable occupancy, it is, in most cases, too early to draw conclusive results about the effectiveness of the policies in the aggregate, though preliminary analysis from HFAs suggests that these incentives are influencing affordable housing development decisions.

While these approaches vary, this paper highlights some emerging trends in how states are defining opportunity and how they prioritize and incentivize opportunity indicators. Additionally, while not all QAPs include an explicit desire to promote affordable housing investment in areas of opportunity, a substantial portion indirectly promote opportunity through scoring incentives offered through relevant indicators. We found that, despite the variety of methods used to define opportunity, there is an emerging trend to incentivize opportunity through five primary indicators: Income levels, Access to Health Care, Access to Transportation, Access to Education and Economic Growth/Jobs.

Appendix A: State Opportunity Incentive Briefs

The following legend applies to each of the State Opportunity Incentive Briefs included in Appendix A.

TABLE LEGEND

FHFA DTS Qualifying: The Federal Housing Finance Agency (FHFA) has conducted a review of all 51 QAPs based on their own set of qualifying characteristics. Their definitions, a list of qualifying states, and their analysis can be found [here](#).

● = Explicit indicator of opportunity¹. If the incentive was part of a definition of opportunity within the QAP, it is considered an explicit indicator.

○ = Implicit indicator of opportunity¹. If the incentive was found outside of a definition of opportunity within the QAP, it is considered an implicit indicator.

Note: in cases where an indicator had both an explicit and implicit preference, the explicit indicator would only be represented in the table.

Mapping Feature: There are four potential options for mapping tool designations. To view a list of these options and how we define each one, please see page 12 of our paper.

There is a federal requirement which grants a 30% basis boost for properties in Qualified Census Tracts and Difficult Development Areas*.

*<https://www.huduser.gov/portal/datasets/qct/qct99home.html>

ALABAMA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No			o	o		Implicit	Opportunity is mappable statewide by a third party using metrics provided

A legend for this table can be found on page 18.

The Alabama Housing Finance Authority’s (AHFA) 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, opportunity is mappable statewide by a third party using metrics provided.

Explicit Definition of Opportunity: Alabama does not include a specific reference to opportunity within its QAP.

Implicit Definition of Opportunity: While there is not an explicit definition of opportunity in Alabama’s QAP, there is a reference to site location characteristics. Projects can receive points for their location in relation to: grocery stores, convenience stores, hospitals or doctors’ offices, pharmacy or drug stores, bank or credit unions. Additionally, projects can receive points for census tract location.

Census Tract Location:

1. AMI 80-100% AMI receives 1 point
2. AMI over 100% receives 2 points

Points deducted for site selection

5 points deducted for each of the following:

- Junk yard or dump, salvage yard, wastewater treatment facility, distribution facilities, electrical utility substations, railroads, adult video/theater/live entertainment, pig or chicken farm, processing plants, industrial, airports, prison, solid waste disposal
- 2 points will be deducted if the condition of the streets and sidewalks are unsatisfactory

Mapping Feature: Alabama does not include a list of census tracts or a map of areas that are considered high opportunity. However, opportunity is mappable statewide by a third party using metrics provided. Using census data, it is possible to determine which census tracts are considered high opportunity based on AMI data.

ALASKA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2016	No		•	•			Explicit	Opportunity is mappable statewide by a third party using metrics provided

A legend for this table can be found on page 18.

The Alaska Housing Finance Corporation’s (AHFC) 2016 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, opportunity is mappable statewide by a third party using metrics provided.

Explicit Definition of Opportunity: AHFC describes certain “market conditions” as promoting opportunity.

Opportunity: for projects located in areas reported by the Alaska Department of Labor where (up to 15 Points):

- Unemployment exceeds the state average by more than 5%: 0 points
- Unemployment is no more than 5% above the state average: 4 points
- Unemployment is no more than 3 % above the state average: 8 points
- Unemployment is no more than 1% above the state average: 10 points
- Unemployment at least equal to the state average: 12 points
- Unemployment is 2.5% or more below the state average: 15 points

Implicit Definition of Opportunity: AHFC offers points to projects with a certain “Rental Market Strength” or “Location Trends”

Rental Market Strength: Project must be located in a city, borough or census area covered by the Department of Labor Survey used to generate the Rental Market Indicators. If the proposed project is not located in a city, borough or census area covered by the Department of Labor Survey, the vacancy rate will need to be determined through a market study using the same methodology employed by the Department of Labor in their survey. The relevant city, borough or census area must contain at least three or more multi-family rental properties to receive points under this category.

Location Trends: (up to 15 Points) - Points will be awarded based on the average growth rates over the most recent three-year period using City and Census Designated Place data. These data are reported on the State of Alaska’s Department of Labor and Workforce Development website.

AHFC also makes it clear that they prefer certain “Project Characteristics”

- Serves lowest income tenants (12 points)
- Extended low-income project use (1 point)
- Projects which serve special needs populations (8 points)
- Project mix (12 points)
- Projects intended for eventual tenant ownership (1 point)
- Preference in occupancy for homeless families (1 point)
- Public housing waiting list (1 point)
- Senior Housing offset (8 points)
- Veterans housing preference (2 points)

Mapping Feature: Opportunity is mappable statewide by a third party using metrics provided. AHFC includes references to the Department of Labor Market Survey and census designated place data. Using these services, it is possible to map opportunity.

ARIZONA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	○		○	○	○	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Arizona Department of Housing’s (ADOH) 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, the current definition of opportunity does not provide sufficient metrics to be mapped statewide.

Explicit Definition of Opportunity: ADOH does not include a specific reference to opportunity.

Implicit Definition of Opportunity: ADOH offers points for projects that have a “Service Enriched Location”

Project is located in an urban area – up to 15 points for projects located within 1-mile radius of:

- Grocery store
- Schools
- Senior center
- VA Health Care Center; Hospital, Urgent Care Clinic of Federally Qualified Health Center
- Recreation Center or Public Park
- Public library
- On Tribal Land

Transit Oriented Design

- Project is located in a certain proximity of a frequent bus transit system
- Project is located in a certain proximity of high capacity transit station
- Door to door transportation at no cost to residents that is available at least twice weekly or on call

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

ARKANSAS

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	○	●	○			Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Arkansas Development Finance Authority’s (ADFA) 2018 Qualified Allocation Plan (QAP) includes both explicit and implicit preferences for opportunity. Additionally, a statewide mapping tool of these incentives is available.

Explicit Definition of Opportunity: ADFA’s 2018 QAP awards points to applicants based on location, defined as “Area of Opportunity Index (AOI) calculated for the development’s Census Tract. Area of Opportunity Index is based on unemployment rate, vacancy rate and population growth. The AOI is calculated for every Census Tract and ranged 0 – 5. Points will be rounded accordingly: 0 – 0.4 receive 0 points, 0.5 – 1.4 receive 1 points, etc.

Implicit Definition of Opportunity: In addition to the AOI, above, ADFA’s 2018 QAP awards points for site selection: “The site location will be evaluated for accessibility and proximity to services appropriate to the type of housing proposed (e.g. grocery stores, schools, medical facilities, public parks and public transportation). The Application shall identify the name, driving directions and driving distance to the site amenities listed below.

“Two (2) points will be given for the following site amenities located within three (3) miles of the site. Site amenities must be appropriate for the population served. Distances will be measured by the shortest available driving distance from the development’s address to the applicable address of the site amenity as calculated by Google Maps. Points will ONLY be given for the site amenities listed below:

- a. Grocery Store or Supermarket;
- b. Pharmacy or Drug Store;
- c. School, daycare or educational center (cannot be awarded if 100% elderly only property);
- d. Public Park or Green Space, as defined in Section I(A) (does NOT include school grounds);
- e. Book lending public library;
- f. Daily operated senior center or facility offering daily services for seniors (can be awarded only if 100% elderly only property);
- g. Hospital, health clinic or medical doctor’s office (medical doctor’s office must have a general practitioner);
- h. Public transportation; and
- i. Access to designated pedestrian trails.

“NOTE: Site amenities presented for scoring shall be referenced in the Market Study map (Market Study Guidelines Section V{B}). All site amenities presented for scoring must list a contact person and a verifiable telephone number in the Application. Points will be deducted on site selection. There is not a limit on the total on the total number of points that can be deducted.”

Mapping Feature: Opportunity feature is already mapped statewide.

ADFA provides an interactive GIS-based map that allows applicants to determine how a proposed project would score on the AOI. The mapping tool is available here: <https://adfa.gov.maps.arcgis.com/apps/webappviewer/index.html?id=fcd39fe0d8d047ed87f6065149f687ee>

CALIFORNIA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017	Yes	•	•	•	•	•	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The California Housing Finance Agency’s (CalHFA) 2018 Qualified Allocation Plan (QAP) includes an explicit preference for opportunity. Additionally, the current definition of opportunity is mapped statewide.

Explicit Definition of Opportunity: CalHFA partnered with UC Davis in order to create the “Regional Opportunity Index” (ROI). “The ROI is a relative measure of people’s assets in education, the economy, housing, mobility/transportation, health/environment, and civic life”.

“The ROI integrates key indicators across a range of important issues—including education, economy, housing, mobility and the environment, and civic life—into a comprehensive measure of opportunity. We have developed separate ROI indices for both people and place, helping to identify factors associated with the demographic characteristics of people, and factors associated with places in which they live. In examining these patterns across the entire state, some interesting overall patterns of disparity in opportunity emerge”.

To learn more about this index and the methodology please click [here](#).

Implicit Definition of Opportunity: CalHFA has an explicit reference to all opportunity indicators.

Mapping Feature: The index maps neighborhoods of varying levels of opportunity. It can be found [here](#).

COLORADO

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	o		o	o	o	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Colorado Housing Finance Authority’s (CHFA) 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, the current definition of opportunity does not provide sufficient metrics to be mapped statewide.

Explicit Definition of Opportunity: CHFA does not include a specific reference to opportunity in its 2018 QAP.

Implicit Definition of Opportunity: CHFA includes incentives for certain Project characteristics that may contribute to opportunity.

(10 points) Project that provides housing for mixed income (i.e., that have no more than 80 percent tax credit-eligible units), including projects financed with private activity bonds. CHFA requires that subject to the Code’s “available unit rule” requirements, low-income set-aside units be distributed proportionately 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.

Among other things, CHFA offers points for “Location of Amenities” and “Walk Score & Transit Score”

Location of Amenities

- Describe the proximity in blocks or miles from the proposed site services and facilities, including neighborhood shopping, drug stores, schools, public transit, hospitals, highways or other major traffic arteries, churches, cultural attractions, and recreational facilities.

Walk Score & Transit Score

- Walk Score is the first large-scale, public-access walkability index and can be calculated at www.walkscore.com. The website ranks site locations and communities nationwide based on a site's proximity to job centers, services, parks, medical facilities, schools and other common destinations. The score will be between 0-100.
- Transit Score is a measure of how well a location is served by public transit and can also be calculated at www.walkscore.com. Transit Score is based on data released in a standard format by public transit agencies. This score is calculated based on a site's proximity to nearby transit routes based on the frequency, type of route (rail, bus, etc.), and distance to the nearest stop on the route. The score will be between 0-100.

Mapping Feature: CHFA does provide tools that would allow for mapping based on Walk Scores and Transit Scores, however it is not possible to map the relation to amenities or a combination of these indicators. For that reason, the current definition of opportunity does not provide sufficient metrics to be mapped statewide.

CONNECTICUT

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017	Yes	●	●	●		○	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Connecticut Housing Finance Authority’s (CHFA) 2017 Qualified Allocation Plan (QAP) includes both explicit and implicit preferences for opportunity. Additionally, a statewide mapping tool of these incentives is available.

Explicit Definition of Opportunity: CHFA’s 2017 QAP awards points for developments located in an Area of Opportunity, defined as “means a development with non-age restricted units of which more than 50% of the development’s total units contain two or more bedrooms, and that is located in a municipality with: Below average poverty levels (Data Source: U.S. Census Bureau, American Community Survey 2011 – 2015 5-Year Estimates), Average to above average ratings for school performance as evidenced by GreatSchools 2013 District Ratings (Data Source: GreatSchools 2013 District Ratings), Above average “Jobs to Population” ratio (Data Sources: 2014 U.S. Census Bureau, Longitudinal Employer-Household Dynamics Survey and the U.S. Census Bureau; Census 2010) and access to higher education opportunities as evidenced by proximity to community/technical colleges (Data Source: The Connecticut State Colleges & Universities (CSCU)).”

- Below Average Poverty Rate – 2 points
- Above Average Performing Schools (Scores in the 8 to 10 range) – 2 points
- or Average Performing Schools (Scores in the 4 to 7 range) – 1 point
- Employment in Community – 2 points
- Access to Higher Education – 2 points

Additional points in this “Opportunity Characteristics” category are available is the “project is located in a municipality where there is less than 10% assisted and deed restricted housing and identified on the “Affordable Housing Appeals Procedure List” published by DOH.

Implicit Definition of Opportunity: In addition to the points above, CHFA’s 2017 QAP awards points for projects located in a Priority Funding Area, defined by meeting at least one of the following criteria:

- Designation as an Urban Area or Urban Cluster in the 2010 Census
- Boundaries that intersect a ½ mile buffer surrounding existing or planned mass-transit stations
- Existing or planned sewer service from an adopted Wastewater Facility Plan

- Existing or planned water service from an adopted Public Drinking Water Supply Plan
- Local bus service provided 7 days a week

Mapping Feature: Opportunity is already mapped statewide.

CHFA provides an interactive Locational Guideline Map, illustrating how Opportunity Characteristics are scored across the state. The mapping tool is available here:

<https://www.policymap.com/widget?sid=2005&wkey=KOSX4J1BEMBZT5GUY1ZVOZ44FOYB6Z9Q&height=700>

DELAWARE

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	Yes	●			○	○	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Delaware State Housing Authority’s (DSHA) 2018 Qualified Allocation Plan (QAP) includes both explicit and implicit preferences for opportunity. Additionally, a statewide mapping tool of these incentives is available.

Explicit Definition of Opportunity: In order to balance housing investments and encourage the creation of affordable housing opportunities with the State that contain little or no affordable rental housing opportunities, but that may offer economic opportunity, proximity to workplaces, high performing schools, and/or supportive infrastructure, DSHA’s 2018 QAP awards points to development proposals that are in Areas of Opportunity. Developments can be New Creation or Preservation and points will be awarded as follows:

Points	% of Units Located in Area of Opportunity
0	%-49.9% of Total Units
7	50%-99.9% of Total Units
15	100% of Total Units

Areas of Opportunity are defined by DSHA as Delaware Market Areas A, B, and C or Wilmington Market Areas A and B and/or areas where students are attending schools achieving a high proficiency level of 90% or higher (*School Attendance Boundary Information – SABINS 2012*). These are strong high-value markets where new affordable housing opportunities should be supported. To determine market areas, the following variables were analyzed for each Census Tract:

- Median residential sales price for housing units sold in 2012 and 2013 (Core Logic)
- Coefficient of variance, which represents the variation of sales price within a given Census Tracts, 2012-2013 (Core Logic)
- Foreclosure filings as a percentage of arms-length residential sales occurring between 2010 and 2013 (County datasets, provided by GCR)
- Vacant housing units as a percentage of all housing units, (US Postal Service Vacancy, 2012)
- Owner occupied units as a percentage of all occupied housing units, 2010 (US Census Bureau)
- Residences sold that were built the years of 2009-2013 as a percentage of all residential sales occurring in 2012-2013 (Core Logic)

- Subsidized rental stock as a percentage of all rental units within the Tract, 2013 (US Department of Housing and Urban Development)
- New construction permits and development applications as a percentage of all housing units, between 2011-2012 (GCR)
- Mobile homes as a percentage of all housing units, 2012 (US Census Bureau, American Community Survey)
- Low density land area computed by assessing the density of housing as a percentage of all land area, 2010 (US Census Bureau)
- USDA Rural Subsidized Housing as a percentage of all rental units, 2014 (US Department of Agriculture)
- Agriculture preservation land as a percentage of all land area, 2013 (DE Dept. of Agriculture, data maintained by Thompson Mapping Systems Inc.)

In addition to these point incentives, DSHA’s 2018 QAP provides a 30% basis boost to projects located in Areas of Opportunity, as defined by DSHA’s Balanced Housing Opportunities map. No applications will be accepted with a state basis boost included in the tax credit calculation, with the exception of projects located in Areas of Opportunity.

Implicit Definition of Opportunity: In addition to Areas of Opportunity, as defined above, DSHA’s 2018 QAP awards up to 15 points to developments that can demonstrate overall quality of location, access to services and transit, and protection of the environment. Each factor of the sites and neighborhood standards must be supported in the market study by the market study provider. Site and Neighborhood scores will be based on the following factors:

- A. Access to transit (0 – 5 points)
- B. Amenities (up to 10 points)

Amenities	Distance measured along existing right of way	
	≤0.5	≤1.0
Grocery of at least 10,000 s.f. 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
Community, civic, or town center open to public	2	1
Fixed Route Transit Stop	2	1
Bank	1	0.5
Department or clothing store	1	0.5
Hardware Store	1	0.5

Post Office	1	0.5
Indoor Fitness	1	0.5
Community facilities: place of worship, community garden, cultural arts, police, or fire station	1	0.5
	Distance measured as radius	
	≤0.25	≤0.5
Public airport	-3	-2
Active landfill/dump/junkyard	-3	-2
Jail, prison, or detention center	-2	-1
Railroad	-2	-1
Heavy Industry	-2	-1

Mapping Feature: Opportunity is already mapped statewide. DSHA maps that include Areas of Opportunity are available at the following Balanced Opportunities Housing Maps link:

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

DISTRICT OF COLUMBIA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017	Yes	○	○	●		○	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Department of Housing and Community Development (DHCD) 2017 Qualified Allocation Plan (QAP) includes both an explicit and implicit preference for opportunity. Additionally, the current definition of opportunity is already mapped statewide.

Explicit Definition of Opportunity: DHCD defines opportunity through “Economic Opportunity Targeting”. § This criteria awards preference points for projects based on location. DHCD seeks to create more affordable housing in high opportunity neighborhoods, those with characteristics such as **low-crime, low-poverty, and access to high quality schools and jobs**. Another goal of this preference is to disperse the District’s affordable housing supply more equitably across neighborhoods and Wards, and to provide a counterbalance to the implicit incentive for developers to build affordable housing in low-cost and high poverty neighborhoods. The map provided in Exhibit A on the subsequent page categorizes D.C. Census Tracts into six zones, based on housing costs. More points will be awarded to projects located in areas of higher economic opportunity.

Additionally, through our outreach to DHCD, the representatives explained that they decided to practice a simpler approach than defined in their QAP. They evaluate two criteria: **1) Rental housing costs by census tract and 2) Homeownership housing costs by census tract**. There is an incentive to properties in the highest cost areas.

Implicit Definition of Opportunity: DHCD also has implicit references to opportunity in their “Location Criteria” and “Project Criteria”.

Location Criteria

Transit Proximity (Maximum 5 points)

- This item awards priority scoring points to projects that are located within ½ mile of a Metrorail station or existing or forthcoming DC Streetcar lines, as evidenced by using the following website: <http://arcg.is/10ChwCA>. Maximum points will be awarded to projects located within 1/4 mile of a Metrorail station or a DC Streetcar line.

Project Criteria

Mixed – Income (Maximum 10 points)

- Maximum points will be awarded for projects that include market-rate units and affordable units serving a variety of household income levels in the same project as defined below. The affordable and market rate units must be equitably distributed within the development in order to comply with federal fair housing regulations and the mix must be achieved within a single building with a shared entrance. Applicants proposing market rate units must be aware that none of DHCD’s gap financing sources that might be made available in conjunction with tax credits can be used to subsidize market rate units (directly or indirectly). Therefore, applicants must

demonstrate that there is sufficient interest from market-rate lenders and investors to fully finance any market rate units.

- Inclusion of market-rate units: A maximum of five prioritization scoring points will be awarded to projects that integrate affordable units with market rate units within the same project. To achieve points, the percent of market rate units must be between 20% to 80% of the total units, and the affordable and market rate units must be equitably distributed within the development in order to comply with federal fair housing rules.
- Providing units for a range of AMI levels: A maximum of five prioritization scoring points will be awarded to projects that propose a mix of affordable units serving varying AMI levels and market rate units within the same project. To achieve points, a minimum of 10% of units must be proposed in each of the following income categories:
 - 0-30% AMI
 - 31-50% AMI
 - 51%-80% AMI
 - 80-120% AMI
 - Market Rate

Projects using DC historic Land (Max 8 points)

Net Zero Energy and Living Building Challenge Preference (Max 5 points)

Mapping Feature: DHCD maps opportunity on a statewide basis. A copy of their map can be found on page 26 of the QAP.

FLORIDA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	Yes	●	●	●	○	○	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Florida Housing Finance Corporation’s (FHFC) 2018 Qualified Allocation Plan (QAP) includes both an explicit and implicit preference for opportunity. Additionally, the current definition of opportunity is already mapped statewide.

Note: Florida allocates credits through a series of Request for Applications (RFAs), which are distributed by both project type and location. While each one differs slightly, we took general themes from all RFAs to summarize their opportunity designations and incentives.

Explicit Definition of Opportunity:

Geographic Areas of Opportunity- Census tracts identified by the Corporation which meet at least two out of the following three threshold criteria as designated by the Corporation based on the average of the three most recent 5-year averages of the American Community Survey: (a) census tract median income greater than the 40th percentile of all census tracts within the county; (b) educational attainment above the median of all tracts in the county, measured as the proportion of adults over 25 years old who have completed at least some college; and (c) tract employment rate greater than the statewide employment rate.

Implicit Definition of Opportunity:

Transit Services (Maximum of 6 points):

- Private Transportation (2 points)
- Public Bus Stop (2 points)
- Public Bus Transfer Stop (6 points)
- Public Bus Rapid Transfer Stop (6 points)
- Public Rail Station (6 points)

Community Services (Maximum 4 Points for each service, up to 3 services)

- Grocery Store - This service is defined in Exhibit B and may be selected by all Applicants.

- Public School - This service is defined in Exhibit B and may be selected only if the Applicant selected the Family Demographic Commitment.
- Medical Facility - This service is defined in Exhibit B and may be selected by all Applicants.
- Pharmacy - This service is defined in Exhibit B and may be selected only if the Applicant selected the Elderly Demographic Commitment (ALF or Non-ALF).

Mapping Feature: Opportunity is already mapped statewide

<https://www.arcgis.com/apps/webappviewer/index.html?id=775a78f4b8d147c09da03edbd3bc2de7&extent=-9988069.693%2C2800734.3376%2C-8253866.3953%2C3757114.4355%2C102100>

GEORGIA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	●	●	●	○		Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Georgia Department of Community Affairs (GDCA) 2018 Qualified Allocation Plan (QAP) includes an explicit preference for opportunity. Additionally, the current definition of opportunity is mapped statewide.

Explicit Definition of Opportunity: GDCA has an explicit reference to “Place Based Opportunity” and “Georgia Department of Public Health Stable Communities”

Place Based Opportunity

Quality Education Areas (3 points)

- Up to three points awarded for applications located in the attendance zone of a high-performing school
- Points awarded based on 2014-2017 college and career readiness performance index (CCRPI)
 - <http://ccrpi.gadoe.org>

Workforce Housing Need and Job Strength (2 points)

- Up to 2 points will be awarded to applications proposing a site in an area with access to local jobs
 - <http://onthemap.ces.census.gov>

Number of jobs threshold:

	City of Atlanta	Atlanta Metro	Other MSA	Rural Area
Threshold	20,000	15,000	6,000	3,000
Exceeding Threshold by 50%	30,000	22,500	9,000	4,500

Georgia Department of Public Health Stable Communities

- GDCA also offers points to properties that are in various demographic breakouts, generally with high incomes. The following map illustrates these breakouts, A1, A2, A3, B1, B2, and C3 receive two points, B3 and C2 receive 1 point:
 - <https://oasis.state.ga.us/gis/demographiccluster/DemoClusters2011.htm>

Implicit Definition of Opportunity: GDCA also has an implicit reference to certain “Desirable Activities” which are eligible for points:

- National big box general merchandise store, typically with a minimum of 50,000 square feet of floor space (e.g., Wal-Mart, Target, Costco, BJ’s, Sam’s Club)
- *Hospital (outpatient centers or emergency care facilities not eligible)*
- Traditional town square which includes an operational anchor institution (e.g. county courthouse, city hall) and which serves as a hub for both commercial activity and community events (only applicable to Rural properties).
- Supermarkets and grocery stores with meat, dairy, and produce (high-end specialty stores and convenience stores not eligible)
- Community or recreational center (e.g. YMCA, Boys & Girls Club, public pool, public gymnasium, senior community or multipurpose facility)
- Elementary, middle, or high school
- Public park/public community garden
- Public library
- *Medical care provider (e.g. clinic, physician/dental office)*
- Licensed day care service
- Fire station or police station
- Retail/clothing/department store (full range of clothing/household items)
- Restaurants
- Federally insured banking institutions (ATMs not eligible)
- Place of worship
- Post office
- Pharmacy

Mapping Feature: Opportunity is mapped statewide using the following links:

- <https://oasis.state.ga.us/gis/demographiccluster/DemoClusters2011.htm>
 - <http://onthemap.ces.census.gov>
 - <http://ccrpi.gadoe.org>
-

HAWAII

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	○	○			○	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Hawaii Housing Finance & Development Corporation’s (HHFDC) 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, the current definition of opportunity is mappable statewide by a third party using metrics provided.

Explicit Definition of Opportunity: Hawaii does not have an explicit reference to opportunity in their QAP.

Implicit Definition of Opportunity:

Hawaii has an implicit reference to opportunity based on “Project Location and Market Demand”

- Project is located in a county’s urban core/district (preference) versus rural district and is accessible to employment opportunities and shopping; and recreational, medical and educational facilities are located in the immediate vicinity of the project site.
 - Located in a County’s urban core: 4 points
 - Located in an urbanized area: 3 points
 - Located in a master planned community: 2 points
 - Located in a rural district in proximity to employment opportunities and medical and educational facilities: 1 point
 - Project may earn two additional 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: 2 points

- Rent and Income limits
 - Units in the project must be rent-restricted to 30% of the imputed income limitations for each unit, based upon HUD AMI and size of units.
 - Gross rent does not include any payment for various rental assistance programs and supportive service assistance. Gross rent must include any allowance for utilities.

Mapping Feature: Hawaii does not provide a mapping feature within its QAP.

IDAHO

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	○	○		○	○	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Idaho Housing and Finance Association’s (Idaho Housing) 2018 Qualified Allocation Plan (QAP) includes implicit preferences for opportunity.

Explicit Definition of Opportunity: Idaho Housing’s 2018 QAP does not include an explicit definition of opportunity.

Implicit Definition of Opportunity: Idaho Housing’s 2018 QAP awards up to 10 points to developments located within the stated distances from goods, services, or major employers, as defined below:

Good and Services – located within 1.5 miles driving distance in urban communities or 3.0 miles driving distance in rural communities

Major Employer – located within 5.0 miles driving distance in urban communities or 10.0 miles driving distance in rural communities

Urban Communities – communities that do not qualify as eligible communities for USDA RD programs

Rural Communities – communities that qualify as eligible communities for USDA RD programs

- Full service Grocery Store (does not include convenience stores)
- Retail Shopping (i.e., hardware, clothing store, etc.)
- Police or Fire Station
- Pharmacy
- Post Office
- Bank/Credit Union
- Public Park
- Education Facility (includes K-12 schools, university, adult education, vocational school, community college)
- Public Library
- Health Club or Recreational Center (i.e. YMCA, etc.)
- Hospital or Medical Clinic, Medical or Dental Office

- Social Services Center (i.e., Senior Citizen Center or Community Center) or Licensed Childcare Facility
- Bus stop, transit stop (i.e., Park & Ride, etc.)
- Public greenbelt bike/walking path access (does not include city sidewalks or street bike lanes)
- Major Employer (as documented in the Market Study or Appraisal)

Third party mileage documentation must accompany the application (i.e., MapQuest, Google Maps, etc.) or distance measured by street/road access must be documented in the market study or appraisal that is submitted with the application.

Additionally, Idaho Housing's 2018 QAP awards 8 points for projects in Primary Market Area, defined as an area with a LIHTC rental vacancy of 3.00% or less, as documented in the market study or appraisal that is submitted with the tax credit application.

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide.

ILLINOIS

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018 - 2019	Yes	●	●	●	●	○	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Illinois Housing Development Authority’s (IHDA) 2018-2019 Qualified Allocation Plan (QAP) includes both an explicit and implicit preference for opportunity. Additionally, the current definition of opportunity is already mapped statewide.

Explicit Definition of Opportunity:

Opportunity Areas (OAs), as defined by IHDA, are communities with low poverty, high access to jobs and low concentrations of existing affordable rental housing. OAs are identified annually and retain the designation for at least four years as long as they continue to meet the identification criteria. Locating your project in an OA is a scoring factor in the [2018-2019 QAP](#). Scattered site projects with at least one site in an OA will receive a pro-rata score based on the proportion of total units located in the OA. Fractional scores will be rounded up to the next whole number.

Community Revitalization Strategies

- Access to employment and living wage jobs;
- Access to healthcare and supportive services;
- Access to a range of community amenities, including (but not limited to) parks, schools, groceries, businesses, and retail locations;
- Access to transportation;
- Improvement in the quality of housing stock; and
- Affordable housing opportunities

Implicit Definition of Opportunity: IHDA also has an implicit reference to opportunity which is found in the “Transit Oriented Development” section of their QAP.

- Transit Oriented Development- All sites are located within a completed, in-process, or programmed RTA-Transit Oriented Development site **or**, for sites that are located outside of the RTA – Transit Oriented Development Program of Northeastern Illinois, a local Transit Oriented Development plan which clearly includes additional housing as an initiative of the plan and is located within ½ mile of a major transportation hub may be submitted. [RTA Transit Oriented Development Viewer.](#)

Mapping Feature: IHDA has an index which maps opportunity across the state, this tool can be found [here](#).

INDIANA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018 - 2019	Yes	●	●	●	●	○	Explicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Indiana Housing and Community Development Authority’s (IHCD) 2018-2019 Qualified Allocation Plan (QAP) includes both explicit and implicit preferences for opportunity.

Explicit Definition of Opportunity: IHCD’s 2018-2019 QAP awards points for meeting the criteria of an Opportunity Index, defined as proximity to growth opportunities such as quality education institutions and livable wages. Poverty rates and household income will be based on the most recent data from the U.S. Census (<https://www.census.gov/programs-surveys/saipe.html>). As of the application due date, the Development must be located within:

- A county at the top quartile for median household income in the state and not within a QCT;
- A county at the bottom quartile for poverty rate in the state and not within a QCT;
- A county that has an unemployment rate below the State average (<http://www.stats.indiana.edu/maptools/laus.asp>);
- A county with a ratio of population to primary care physicians of 2,000:1 or lower (<http://www.countyhealthrankings.org/app/indiana/2017/measure/factors/4/data>);
- A development that is within 1 mile of a university, college, trade school, or vocational school;
- A development that is within 1 mile of one of the 25 largest employers in a county <http://www.hoosierdata.in.gov/buslookup/BusLookup.aspx>;
- 1 point will be deducted if the proposed site falls within a census tract that is defined as a Racially/Ethnicity Concentrated Area of Poverty (“R/ECAP”) by HUD’s Affirmatively Furthering Fair Housing mapping tool at <https://egis.hud.gov/affht/#>.
 - This 1-point deduction will not apply to developments competing in the Preservation set-aside.
 - This 1-point deduction will not result in negative total points under the opportunity index scoring category. The lowest an application can score under opportunity index is zero.

Implicit Definition of Opportunity: In addition to the Opportunity Index, above, IHCD’s 2018-2019 QAP awards points for “Desirable Sites,” which includes points for location efficient projects and transit oriented developments:

- **Location Efficient Projects:** promote projects that provide nearby access to healthy food options, community facilities, services, healthcare and retail center. Up to 3 points will be awarded to projects that are located within ½ mile walking distance of at least 3 facilities from the list below (from a minimum of 2 categories) or within 1-mile walking distance of 5 facilities from the list below (from a minimum of 2 categories). One of the facilities must be a store with fresh produce, such as a supermarket or grocery store to qualify for the maximum points in this category. Developments without access to fresh produce may receive partial points.
 - Stores with fresh produce must:
 - Be currently established.
 - Have a physical location.
 - Have regular business hours.

For the purposes of this scoring category, farmer’s markets, produce stands, gas stations, convenience stores, and drug stores do not qualify as stores with fresh produce.

Civic of Community Facilities	Services	Retail	Healthcare
<ul style="list-style-type: none"> - Licensed childcare - Community or recreation center - Entertainment venue - Education facility (including K-12, university, adult education, vocational school or community college) - Cultural arts facility (museum, performing arts theater, etc.) - Police or fire station - Public library - Public park - Post office - Government office that serves public onsite - Social services center 	<ul style="list-style-type: none"> - Bank - Restaurant, café, diner - Laundry or dry cleaner - Gym, health club, exercise studio - Licensed adult or senior care 	<ul style="list-style-type: none"> - Supermarket - Other food stores with fresh produce (as defined above) - Clothing retail - Other retail 	<ul style="list-style-type: none"> - Pharmacy - Doctor’s or nurse practitioner’s office - Optometrist - Dentist - Physical therapy office - Clinic - Hospital

- Transit Oriented Development: award 2 points if a project is located within ½ mile of filed transit infrastructure.
 - “Fixed transit infrastructure” is defined as light rail station, commuter rail stations, ferry terminals, bus rapid transit stations, streetcar stops, bus stops or major bus transit centers.
 - If the fixed transit infrastructure does not yet exist, the transit investment must be planned, approved and funded at the time of application. Transit investments that have been funded but not completed will be considered. Verification must be provided.
 - Rural and small city sites may qualify for this category if applicants can show documentation of an established point to point transit service that provides pick up service to within a ¼ mile of the site.

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide.

IOWA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	Yes	•	•	•	•	•	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Iowa Finance Authority’s (IFA) 2018 Qualified Allocation Plan (QAP) includes explicit preferences for opportunity. Additionally, a statewide mapping tool of these incentives is available.

Explicit Definition of Opportunity: IFA’s 2018 QAP awards points for projects that are located in an Iowa Opportunity Index Census Tract that is identified as a very high or high opportunity area. The QAP goes on to state that the objective of pinpointing Opportunity Areas is to identify places that are good locations for investment that may not have been selected based on other criteria. This identification allows for balanced investment across neighborhoods that offer opportunities and advantages for families. If a scattered site project, all building addresses shall be listed in a qualifying opportunity area to be eligible for points. If buildings are in different categories of qualifying opportunity areas, the lesser points shall be awarded.

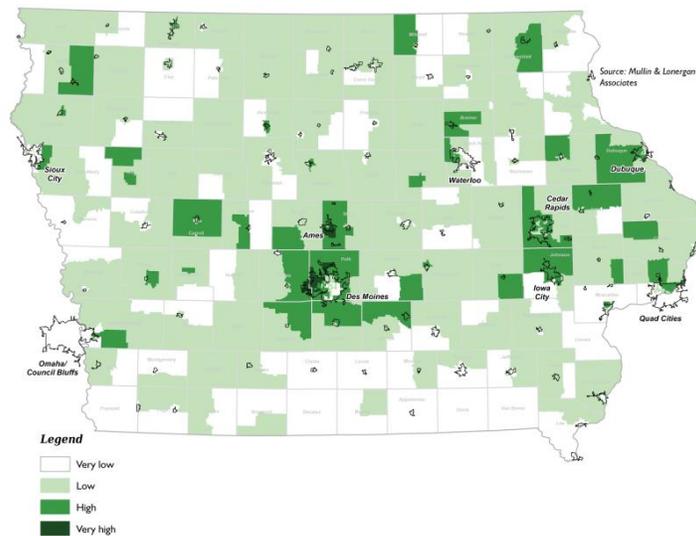
Iowa Opportunity Index Census Tracts

- The “high” and “very high” opportunity areas were calculated as part of the State of Iowa’s Analysis of Impediments to Fair Housing Choice. IFA and IEDA (Iowa Economic Development Authority) are required to conduct such an analysis because both agencies administer HUD funding. One of the components of the Analysis is to identify Opportunity Areas.
- HUD adapted the Communities of Opportunity model to calculate opportunity index scores for each census block group on six separate dimensions. Each dimension analyzed for Iowa’s Analysis of Impediments to Fair Housing Choice includes a collection of variables describing conditions for each census tract in the State.
 - Prosperity includes rates of family poverty and the receipt of public assistance (cash welfare, such as Temporary Assistance to Needy Families) to capture the magnitude of a given neighborhood’s rate of poverty.
 - Labor Market Engagement measures the level of employment, labor force participation, and educational attainment in each neighborhood to describe its local human capital.
 - Job Access gives each census tract a score based on distance to all job locations, weighting larger employment centers more heavily. The distance from any single job location is positively weighted by the number of job opportunities at that location and inversely weighted by the labor supply (competition) of the location.

- Mobility was calculated based on commute times and the percent of people who travel to work via public transit.
- School Proficiency uses the results of the Adequate Yearly Progress (AYP) test by elementary, middle, and high school students as a proxy for educational quality. Rates of proficient scores for all grades for both the reading and math exams are combined into one overall score for each school district.
- Community Health for a given tract was calculated as a function of the number of residents without health insurance and low food access ranking by the USDA.

Implicit Definition of Opportunity: IFA’s 2018 QAP does not include any implicit references to opportunity.

Mapping Feature: Opportunity is already mapped statewide. The Comprehensive Opportunity Index included in Appendix D of IFA’s 2018 QAP Application Package is reproduced below:



KANSAS

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	o	o		o	o	Implicit	Opportunity is mappable statewide by a third party using metrics provided

A legend for this table can be found on page 18.

The Kansas Housing Resources Corporation’s (KHRC) 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, the current definition of opportunity is mappable statewide by a third party using metrics provided.

Explicit Definition of Opportunity: KHRC does not have an explicit reference to opportunity.

Implicit Definition of Opportunity:

KHRC includes a section in its QAP called “Site Usability, Accessibility, and Marketability”. One of the incentives is for Transportation/Predestination. Easy access to the site by car, foot, or public transit will score high.

KHRC also has a reference to “Neighborhood Quality”

- Growth Patterns. Applications will score high if they are located in areas with high growth, remote areas will score low.
- Adjacent Uses. Close proximity to retail, schools, medical services, hospitals, day care/support services, recreation/cultural, churches, and jobs.

Lastly, there is an incentive based on “Property Location”

- A property is located in a county of the state with a median income greater than the statewide non-metro average – 10 points
- Site locations will be further evaluated for community support, neighborhood consistency, and site usability, accessibility, and marketability – 20 points

Mapping Feature: KHRC does not provide a mapping tool. However, these areas can be mapped through third party platforms.

KENTUCKY

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017 – 2018	No	○	○	○		○	Implicit	Opportunity is mappable statewide by a third party using metrics provided

A legend for this table can be found on page 18.

The Kentucky Housing Corporation’s (KHC) 2017-2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity, additionally opportunity is mappable statewide by a third party using metrics provided.

Explicit Definition of Opportunity: KHC does not have an explicit reference to opportunity in their QAP.

Implicit Definition of Opportunity:

KHC includes several implicit mentions of opportunity in their 2017 Scoring Workbook. The workbook lays out various categories such as: new supply, existing supply, community impact, and non-profit supportive housing. There are also different scoring metrics for pool-specific scoring and individual project scoring. Below is a summary of the implicit indicators of opportunity.

- Proximity to amenities
- Greatest Job Growth/SOAR
- Community Transportation
- Outside of a QCT
- Walkable proximity
- Poverty Rate
- Income Targeting
- Strong Schools/Senior Services

Mapping Feature: Opportunity is mappable statewide by a third party using metrics provided

LOUISIANA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017	Yes	○		○	○	○	Implicit	Opportunity is readily mappable statewide from the metrics provided

A legend for this table can be found on page 18.

The Louisiana Housing Corporation’s (LHC) 2017 Qualified Allocation Plan (QAP) includes implicit preferences for opportunity. Using the metrics provided, opportunity is readily mappable statewide.

Explicit Definition of Opportunity: LHC’s 2017 QAP does not include an explicit reference to opportunity.

Implicit Definition of Opportunity: LHC’s 2017 QAP awards points for “de-concentration projects” (which includes geographic diversity) and neighborhood features.

- Geographic Diversity: Project is located in census tract in which the median income of the census tract exceeds one of the following as determined by <https://www.ffiec.gov/>:
 - 120% of the area median income for the MSA – 10 points
 - 150% of the area median income for the MSA – 12 points
- Neighborhood features (maximum 10 points, maximum 1 point per service. One point will be awarded for the services within a mile from the Project. One half points will be awarded for any service listed that is located over 1 mile but is within 2 miles from the Project):
 - Grocery Store
 - Public Library
 - Hospital/Doctor Office or Clinic
 - Bank/Credit Union (must have live tellers)
 - Elementary School (including magnet, charter, private and other licensed elementary schools)
 - Post Office
 - Pharmacy/Drug Store
 - Public Transportation (shuttle services excluded)
 - Current Louisiana Licensed Adult/Child Day Care/ After School Care
 - Elementary School receiving a grade of “B” or better by the Louisiana Department of Education

LHC's second tiebreaker in the 2017 QAP gives preference to projects which promote geographic diversity by being located in a census tract with high area median incomes.

Additionally, LHC's 2017 QAP requires 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 (Note: applicable to both new construction and rehabilitation projects).

Mapping Feature: Opportunity is readily mappable statewide from the metrics provided.

MAINE

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	Yes		○	●		○	Explicit	Opportunity is readily mappable statewide from the metrics provided

A legend for this table can be found on page 18.

The Maine State Housing Authority’s (MaineHousing) 2018 Qualified Allocation Plan (QAP) includes both explicit and implicit preferences for opportunity. Using the metrics provided, opportunity is readily mappable statewide.

Explicit Definition of Opportunity: MaineHousing’s 2018 QAP awards points for high opportunity areas, defined as project located in a Census Tract with the following area median income as determined under the most current American Community Survey:

Area Median Income of Census Tract	Points
\$40,000 or more	4 points
\$55,000 or more	6 points

Implicit Definition of Opportunity: In addition to the high opportunity areas, defined above, MaineHousing’s 2018 QAP awards points for Smart Growth. To qualify, the project must incorporate principles of smart growth as follows:

1. *Access to Public Transportation*
The Project is located within a Safe Walking Distance of not more than ½ mile of a designated pick-up location for existing Fixed route Public Transportation – 4 points **OR** Demand Response Transportation is available to all of the tenants of the Project. Demand Response Transportation services with eligibility criteria that limit or deny service to any tenants of the Project are not eligible - 1 point
2. *Proximity to Activities Important to Daily Living*
The Project is located within a Safe Walking Distance of not more than ½ mile of at least 3 Activities Important to Daily Living - 3 point
3. *Proximity to Significant Place of Employment*
The Project is located within 5 miles of a Significant Place of Employment - 3 points

Mapping Feature: Opportunity is readily mappable statewide from the metrics provided.

MARYLAND

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2016	Yes	•	•	•		○	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Maryland Department of Housing and Community Development’s (DHCD) 2016 Qualified Allocation Plan (QAP) includes both explicit and implicit preferences for opportunity. Additionally, a statewide mapping tool of these incentives is available.

Explicit Definition of Opportunity: DHCD’s 2016 QAP awards points to family projects with reasonable access to jobs, quality schools, and other economic and social benefits, as demonstrated by meeting at least one (1) of the following two (2) criteria:

1. Be located in a “Community of Opportunity.” The three major indicators that comprise the Composite Opportunity Index are:

Community Health: The community health indicator represents the wealth and quality of life in a community relative to the State average. The community health indicator has six (6) components, as follows:

- Median household income obtained from the U.S. Census’ American Community Survey (ACS) 2007-2011, five-year estimate. Household income is positively correlated with community health. Higher household incomes support a more diversified economic base and enhance the tax basis and services of its local government.
- Ratio of owner-occupied to all occupied housing units (a proxy for homeownership rate) obtained from the ACS 2007-2011, five-year estimate. A higher homeownership rate indicates the economic stability of a community, which is positively correlated with community health.
- Median value of owner-occupied housing units obtained from the ACS 2007-2011, five-year estimate. This statistic indicates the strength of a community’s real estate market relative to the average statewide market condition and is highly correlated with community health.
- Population growth between 2010 and 2012 obtained from the Economic and Social Research Institute (ESRI) 2012 community profile. A component of population growth is the number of people relocating to a community so this measures the quality of life in a community and is positively correlated with community health.
- Poverty rate, obtained from the ACS 2007-2011, five-year estimate. The poverty rate highlights the detrimental impact of concentrated poverty on quality of life in a community. This variable is inversely correlated with community health.

- Property vacancy rate obtained from the ESRI 2012 community profile. An elevated property vacancy rate negatively impacts community health. Vacant property is often correlated with higher crime and depreciation of property values in a community.

Economic Opportunity: Economic opportunity measures the extent to which a community provides employment opportunity and mobility to its residents. Employment opportunity is measured by the following variables:

- Prevailing unemployment rate obtained from the ACS 2007-2011, five-year estimate. This variable, which measures employment opportunity in a community, is inversely related with economic opportunity.
- Median commute time to work obtained from the ACS 2007-2011, five-year estimate. The commute time measures proximity to regional employment opportunities and is inversely related with economic opportunity.

Educational Opportunity: Educational opportunity measures the outcomes of student performance and educational attainment in the community. This indicator is measured by the following variables:

- Maryland School Assessment (MSA) scores, proficient and advanced, for elementary, middle, and high school students obtained from Maryland Department of Education for the 2011/2012 academic year. 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.
- Percent of population with a college degree (both undergraduate and graduate degrees) obtained from the ACS 2007-2011, five-year estimate. This variable is positively related to educational opportunity.
- Percent of population with no high school diploma, obtained from the ACS 2007- 2011, five-year estimate. This variable is inversely related with educational opportunity.

2. 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. As of the publication of this Guide, DHCD is aware of two such settlements:
 - a. Baltimore City: The case of Thompson v. HUD. The following link provides information on census tracts designated as Communities of Opportunity in the Thompson case: <http://www.brhp.org>
 - b. Baltimore County: The Conciliation Agreement among HUD, several complainants, and Baltimore County to designate 116 census tracts in Baltimore County as Communities of Opportunity.

Implicit Definition of Opportunity: In addition to points for locating in an area of opportunity, described above, DHCD's 2016 QAP awards points to projects that are part of a MDOT-designated TOD.

Mapping Feature: Opportunity is already mapped statewide. 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. To be designated a Community of Opportunity, and mapped as such to the Maryland QAP Comprehensive Opportunity Maps, the community must have a Composite Opportunity Index that is above the statewide average. DHCD's QAP Comprehensive Opportunity Maps can be accessed here:

<http://www.dhcd.state.md.us/GIS/multifamily/index.html>

MASSACHUSETTS

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017	No	•	•	•	•	•	Explicit	Opportunity is mappable statewide by a third party using metrics provided

A legend for this table can be found on page 18.

The Massachusetts Department of Housing and Community Development’s (DHCD) 2017 Qualified Allocation Plan (QAP) includes an explicit preference for opportunity. Additionally, opportunity is mappable statewide by a third party using metrics provided.

Explicit Definition of Opportunity: Mass Housing has several mentions of opportunity throughout its QAP.

Area of Opportunity Defined: In a neighborhood or community with a low concentration of poverty (below 15%) based on U.S. Dept. of HUD data and that offers access to jobs, health care, high- performing school systems, higher education, retail and commercial enterprise, and public amenities; OR other similar indices of opportunity consistent with DHCD fair housing principles and policies.

There are four “priority categories for funding”

1. Housing for extremely low-income individuals, families, and seniors
2. Investment in distressed and at-risk neighborhoods
3. Preservation of existing affordable housing
4. *Family housing in neighborhoods and communities* that provide access to opportunities, including, but not limited to jobs, transportation, education, and public amenities. Access to opportunity locations will be defined by publicly-available data. At least 65% of the units in a project must include two or more bedrooms, and at least 10% must be three-bedroom units, unless that percentage of two-bedroom or three-bedroom units is infeasible or unsupported by public demand. Projects serving families, including families with a member with a disability or special needs, are eligible in this category.

High Opportunity Scoring

For purposes of allocating the credit in 2017, DHCD will continue using four priority funding categories, including location of a family project in an “area of opportunity”. The Department defines an area of opportunity in part as a neighborhood or community with a relatively low concentration of poverty based on U.S. Department of HUD data. In

In addition, DHCD identifies an area of opportunity as a neighborhood or community that offers access to opportunities such as jobs, health care, high-performing school systems, higher education, retail and commercial enterprise, and public amenities. To determine whether a location is an area of opportunity, sponsors should use publicly available data such as employment statistics; location near mass transit, green space, and other public amenities; educational testing data; and so on. Sponsors also should confirm with DHCD that their evaluation of an area of opportunity is consistent with the Department's evaluation, since the Department will make the ultimate decision.

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%. Projects located in municipalities with overall poverty rates below 15% may also qualify for points within this scoring category. On a case by case basis, at its sole discretion, the Department will permit certain projects to receive points in this category if the poverty rate in the census tract and/or the municipality is 15% or higher, as long as the project is located in an area with compelling attributes that make the location desirable to renters.

1. To be eligible, a property must be at least 65% two bedroom or larger units and at least 10 % three bedrooms units
2. Public school system – based on the percent of 10th grade students that received Advanced or Proficient on tests
 - a. 90% - 8 points
 - b. 75% - 2 points
3. Access to employment – 6 points
4. Access to higher education – 2 points
5. Access to healthcare – 2 points
6. Projects located in QCT's – 3 points
7. Proximity to transit – 6 points

Implicit Definition of Opportunity: All mentions of opportunity were considered explicit.

Mapping Feature: Mass housing does not include a mapping feature to map these areas. However, it is explained in the QAP that "Access to opportunity locations will be defined by publicly-available data". Therefore, Opportunity is mappable statewide by a third party using metrics provided.

MICHIGAN

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017 - 2018	No		•			•	Explicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Michigan State Housing Development Authority’s (MSHDA) 2017-2018 Qualified Allocation Plan (QAP) includes explicit preferences for opportunity.

Explicit Definition of Opportunity: According to MSHDA’s 2017-2018 QAP, many of the policies in place are designed with the intent of ensuring that affordable housing is available in areas of high opportunity. To accomplish this, the 2017-2018 QAP places a great amount of emphasis on the strength of a project’s location by considering many factors as further highlighted below. It is the intention of these policies to develop and revitalize housing in areas that have a significant quantity of community amenities, offer tenants access to mobility and jobs, and that will be a focal point for further future investment.

The following are key criteria within the QAP and other related policies that have a direct correlation to creating and/or preserving affordable housing and allowing lower-income residents to live in areas of greater opportunity:

1. Proximity to Transportation/Walk Score
2. Developments Near an Employment Center
3. Neighborhood Investment Activity Areas
4. Affordable/Market Rent Differential
5. Mixed Income Development
6. Rural Set-Aside

According to the QAP itself, there is “a heavy emphasis on location because strong locations that are proximate to a large amount of amenities can have significant benefits for residents. Among these benefits are the potential for enhanced quality of life, proximity to employment, and reduced transportation costs associated with living in walkable areas. Residents desire to live and work in locations where there is a high quality of life and where there are a multitude

of opportunities to continue to better their current situation. Residents that are in need of affordable housing are no different in what they desire and affordable housing should be no different in what it offers them. It is for these reasons that the QAP intentionally focuses on areas of opportunity.”

MSHDA’s 2017-2018 QAP defines the categories contributing to opportunity as follows:

- **Transportation:** Applicants that can demonstrate that the project is located within 1/10 of a mile from a public transportation stop (i.e. bus stop), or are creating a public transportation stop within 1/10 of a mile, will be eligible to receive 5 points. Alternatively, a project will be considered for 5 points if the applicant can demonstrate that it will provide 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. For these purposes, comparable transportation should be available on weekends as well as weekdays and transportation that is provided by the development should have the capacity to adequately serve all the tenants in the development based on the size of the development. For example, one 15-passenger van may not be sufficient to serve a very large development. For further clarity, MSHDA expects that the transportation provided should be sufficient to allow each tenant in the development to take at least two trips during the seven-day week. For example, a 15-passenger van running two routes per day seven days per week would accommodate 210 passengers per seven-day week. This would be sufficient to accommodate a 100-unit development, which would require 200 trips per seven-day week.
- **Developments Near an Employment Center:** An Employment Center is defined as a single university (or college), single hospital, single governmental entity, or a single private company that has at least 250 year-round employees in one location. In order for a project to be considered for these points, the project must meet all of the following criteria:
 - For projects meeting the definition of Rural in the QAP, the project must be located within a one-mile radius of the location of the Employment Center where 250 full-time year-round employees work. For all other projects, the project must be located within a 0.5-mile radius of the location of the Employment Center where 250 full-time year-round employees work.
 - The project must meet MSHDA site selection criteria.
 - The project must obtain a letter from either the employer, a third-party employment agency, or local unit of government stating the number of full-time year-round employees that work at the location that is within a 0.5-mile (or one mile, if applicable) radius of the project.
 - All 250 year-round employees must be in the same location (not multiple locations) that meets the criteria established above to receive points.
- **Neighborhood Investment Activity Areas:** Points will be awarded for projects that meet the criteria under either item #1 or item #2 below:
 - Located in an area where a Neighborhood Revitalization Plan is in place and recent and/or significant investments are occurring in the area as a result of the plan. This will be demonstrated through the submission of the items below:

- A signed letter or resolution from the local government dated within 60- days of the application due date that identifies, supports and outlines the significance of the proposed project, and includes:
 - Identification of the Neighborhood Revitalization Plan for the area. For this purpose, a Neighborhood 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.
 - Includes a link to the plan if not included in the application.
 - Outlines the goals of the plan.
 - Defines the specific boundaries of the targeted area.
 - Describes how the proposed project complements the plan goals.
 - Describes the significant public and/or private investment that is occurring or that is anticipated for the targeted area.
 - A detailed map outlining the target area which also identifies the proposed project and clearly indicates the public and/or private investments (via a legend) that have recently occurred, are occurring, or are expected to occur in the area.
 - Documentation to evidence the major public and/or private investment in the area of the project.
 - A narrative description that demonstrates how the project qualifies under the neighborhood revitalization plan criteria.
- **Affordable/Market Rate Differential:** All projects in locations where the average rents of comparable market-rate rental units, based on the Primary Market Area and the comparables described in the project market study, exceed the affordable 60% AMI rent limit by 20% or more will be eligible for 5 points. For these purposes, units will be considered comparable if they are the same type and number of bedrooms as the affordable units that are being proposed in the development. These points are only available to projects where all of the proposed units meet this criteria.
 - **Mixed income development:** In order to be eligible for points under Mixed Income Development, projects must be either:
 - Creating new market rate units or preserving existing market rate units as part of the LIHTC project, owned by the LIHTC entity, or;
 - Creating new market rate units or preserving existing market rate units as part of the same development plan and on a similar development timeline as the LIHTC units, but that will be owned by a separate ownership entity under a condominium structure.

Projects meeting the requirements of this section will be eligible for up to 6 points based on the scoring matrix below:

- Greater or equal to 10% of units at market rate = 2 points
- Greater or equal to 20% of units at market rate = 3 points
- Greater or equal to 30% of units at market rate = 5 points
- Greater or equal to 40% of units at market rate = 6 points

Market rate units must be evenly distributed among bedroom types and buildings as is possible and appropriate based on the market demand and must not be age restricted. The Internal Revenue Code states that scattered site projects cannot include market rate units.

- **Rural Set aside:** Proposed or existing housing projects that fall into one or more of the following categories: a) financed by a loan guaranteed by Rural Housing Services or a successor agency; b) funded by a federal program for the development of rural housing; or c) is located in an area other than a metropolitan area.

Implicit Definition of Opportunity: Include any implicit indicators, and where they fit into the QAP (For example, transit incentive) or N/A if not applicable.

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

MINNESOTA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017	Yes		●	●		○	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Minnesota Housing’s 2017 Qualified Allocation Plan (QAP) includes both an explicit and implicit preference for opportunity. Additionally, opportunity is already mapped statewide.

Explicit Definition of Opportunity: Minnesota Housing defines opportunity through what they call “Economic Integration”

Economic Integration: providing at least 25% but not greater than 80% of the total units in the project as qualified HTC low-income units (does not include full-time manager or other common space units) OR projects are awarded points for being located in higher income communities that are close to jobs outside of Rural/Tribal Designated areas. First and second tier economic integration areas are outside of racially and ethnically concentrated areas of poverty.

Implicit Definition of Opportunity: In addition to the explicit definition of opportunity, Minnesota Housing also lists a few “Strategic Priority Policy Thresholds”:

- Access to fixed transit
- Workforce Housing
- Economic Integration
- Tribal
- Planned Community Development
- Preservation
- Supportive Housing

Mapping Feature: Opportunity is already mapped statewide

<http://mnhousing.gov/wcs/Satellite?c=Page&cid=1394436712945&pagename=External%2FPage%2FEXTStandardLayout>

MISSISSIPPI

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017 - 2018	Yes	●	●	●	○		Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Mississippi Home Corporation’s (MHC) 2017-2018 Qualified Allocation Plan (QAP) includes both explicit and implicit preferences for opportunity. A statewide map identifies these High Opportunity areas.

Explicit Definition of Opportunity: MHC’s 2017-2018 QAP awards 10 points to developments located in a high opportunity area. In identifying opportunity, MHC considers the following:

- a) A combination of the following indicators from the Environmental Systems Research Institute, Inc. (ESRI):
 - Median Household Income >= 70% of MS 2015 Median Household Income
 - Population Growth
 - Median Household Income Growth
 - Unemployment Rate
 - Counties that had more than 500 new hires per quarter in 2014

- b) High-performing school districts: defined as areas that have a public-school district with a “B” or higher rating as listed in the Mississippi Department of Education’s Accountability Results (<http://www.mdek12.org/OPR/Reporting/Accountability/2014>).

Additionally, developments located in high opportunities area, as defined above, are eligible for MHC’s discretionary 130% basis boost.

Implicit Definition of Opportunity: Under the heading of “Sustainable Development,” MHC’s 2017-2018 QAP awards points to a proposed development with at least two of the following services located within on half mile of the proposed site:

- grocery store
- pharmacy
- bank or credit union
- hospital or medical clinic

Mapping Feature: Opportunity is already mapped statewide. The MHC generated map can be accessed here:

<http://mshc.maps.arcgis.com/apps/View/index.html?appid=e703214f7d92496ca4cc60f010e5fd01>

MISSOURI

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	•	•	•		•	Explicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Missouri Housing Development Commission’s (MHDC) 2018 Qualified Allocation Plan (QAP) includes an explicit preference for opportunity.

Explicit Definition of Opportunity: MHDC’s 2018 QAP encourages 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.

Implicit Definition of Opportunity: N/A

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide.

MONTANA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	○			○	○	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Montana Housing’s 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, the current definition of opportunity does not provide sufficient metrics to be mapped statewide.

Explicit Definition of Opportunity:

There was no explicit reference to opportunity found within Montana Housing’s QAP.

Implicit Definition of Opportunity:

Montana has an implicit reference to opportunity within “Project Location”

An Application will be awarded points to the extent the Project is located in an area where amenities and/or essential services will be available to tenants, determined according to the following specifications. An Application will be awarded points with respect to an amenity or service as specified below, if: (i) a Project is located within 1½ miles of the specified amenity or essential service; (ii) public or contracted transportation (not including taxi or school bus service) 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 (iii) where applicable, the specified amenity or service is available via a no-charge delivery service to the Project Location:

- 20 points for grocery store (convenience store does not count); and
- 10 points for each of the following, up to a maximum of 80 points:
 - One or more public schools;
 - Senior Center;
 - Bank;
 - Laundromat (only if washer/dryer not included in unit or onsite);
 - Medical services appropriate and available to all prospective tenants (e.g., hospital, doctor offices, etc.);

- Pharmacy services appropriate and available to all prospective tenants;
- Gas station and/or convenience store;
- Post Office;
- Public Park;
- Shopping (department, clothing or essentials – does not include convenience store); or
- Public Library

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

NEBRASKA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	o	o		o		Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Nebraska Investment Finance Authority’s (NIFA) 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, the current definition of opportunity is mappable statewide by a third party using metrics provided.

Explicit Definition of Opportunity:

There was no explicit reference to opportunity found within Nebraska Housing’s QAP.

Implicit Definition of Opportunity:

NIFA has created a program, “Collaborative Resources Allocation for Nebraska Set-Aside”, otherwise known as CRANE, which implicitly incentivizes opportunity.

In an effort to target specific economic growth, community development and the provision of specific types of affordable housing, NIFA will set-aside up to 33% of Nebraska’s annual LIHTC authority to be allocated pursuant to the CRANE program.

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. NIFA will set-aside up to 33% 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 8(d)). The CRANE Program is a strategic alliance among NIFA and other collaborating resource providers. 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. NIFA will work with other collaborating resource providers to coordinate the various resources available for a community requesting funds for a development pursuant to the CRANE Program and identify those proposals which best demonstrate the need for LIHTC and AHTC to address the needs identified by a community.

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

NEVADA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No				o	o	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Nevada Housing Division’s (NHD) 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity.

Explicit Definition of Opportunity: N/A

Implicit Definition of Opportunity: NHD’s 2018 QAP awards up to 5 points for site location:

- 1) The site (or designated center of the site for scattered-site projects) is within ¼ mile of at least three of the following: grocery, pharmacy, bank, school, day care, parks, community centers, medical facilities, library, place of worship, post office (proximity to day care facilities is not applicable for Senior Housing projects) – 2 points
- 2) The site (or designated center of the site for scattered-site projects) is within ¼ mile of a designated pedestrian/bicycle path aside from sidewalks – 1 point
- 3) For Clark and Washoe Counties, the site is within ¼ mile of a local transit route or school bus stop (school bus stop is not applicable for Senior Housing projects). For all other counties, the site is within 1/2 mile of a local transit route or school bus stop (school bus stop is not applicable for Senior Housing projects). – 1 point
- 4) Project is USDA funded.
- 5) The project’s capacity to serve as a stimulus for other development in the vicinity or to provide a needed residential population that may support nearby local businesses in the area and thus promote a more vibrant neighborhood environment (must submit with the application a letter from the Director of the local jurisdiction’s Community Development Department or their equivalent, stating the above and their support) – 1 point

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide.

NEW HAMPSHIRE

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No					o	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The New Hampshire Housing Finance Agency (New Hampshire Housing) Qualified Allocation Plan (QAP) includes implicit preferences for opportunity.

Explicit Definition of Opportunity: N/A

Implicit Definition of Opportunity: New Hampshire Housing’s 2018 QAP awards points for location near transit under the Community Development Component scoring criteria:

- i. Projects located within a Community Center Area (CCA) as shown on the Planning Metrics Gateway available at: <http://granitweb-dev2.sr.unh.edu/GSFhtml5Viewer/> 10 points
- ii. 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 points with a Walkscore of 32 or higher - 10 points
- iii. Projects which are located in formally designated community revitalization areas (e.g. HUD Enterprise Zones, Main Street Programs, historic districts, designated blighted areas or otherwise targeted areas). The minimum size improvement zone for this scoring category is generally a one-block area, but cannot have been specifically created for the benefit of the proposed project. The formal designation must come from an official act by a government agency, such as a city council or town board - 10 points
- iv. Smart Growth Components. Projects with the following components will score 2 points each, maximum total of 10 points:
 - Public water supply - 2 points
 - Public sewer - 2 points
 - Piped natural gas available - 2 points

- Appropriate zoning without variance - 2 points

Municipally-maintained off-site sidewalks accessible from the site and leading within ¼ mile to a Community Center Area (see (i) above), to fixed route public transportation, or to a grocery store (a self-service retail establishment that primarily sells food) - 2 points

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

NEW JERSEY

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017	No	○	○		○	○	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The New Jersey Housing and Mortgage Finance Agency’s (NJHMFA) 207 Qualified Allocation Plan (QAP) includes implicit preferences for opportunity.

Explicit Definition of Opportunity: NJHMFA’s 2017 QAP does not include an explicit preference for opportunity.

Implicit Definition of Opportunity: NJHMFA’s 2017 QAP awards points up to 6 points for applicants meeting the following requirements:

- A project that is fully located within a school district wherein 40 percent or more of the students are either meeting expectations (Level 4) or exceeding expectations (Level 5) on the Grade 4 Partnership for Assessment of Readiness for College and Careers (PARCC) assessment in both math and language arts based on data available from the New Jersey Department of Education as of the application deadline shall receive two points. NJHMFA shall rely upon the data effective in the calendar year of the application deadline as well as the preceding year
- A project that is fully located within a municipality with public and private sector jobs that total at least 95% of the housing units shall receive two points.

Additionally, NJHMFA’s 2017 QAP awards points to projects located within a transit oriented development where at least five percent of the tax credit units are large family units. An additional two points to projects that are fully located within 1/2 mile of public transportation. Points are also awarded for proximity to amenities as follows: Unless otherwise indicated, projects located within one-half mile of the positive land uses in (1) through (15) below or, with respect to (16) and (17) below only, inclusion within the defined categories, shall receive two points. Multiple points shall not be awarded for proximity to multiple positive land uses of the same category (that is, a project located within one-half mile of two supermarkets will receive two points, not four points):

1. Full-service grocery store or supermarket (minimum 15,000 sq ft)

2. Pharmacy
3. Department or retail merchandise store
4. Bank/credit union
5. Restaurant, exclusive of fast-food restaurants
6. Indoor public recreation facilities, such as civic centers, community centers, and libraries
7. Outdoor public recreation facilities; such as parks and swimming pools
8. Hospital/medical clinic
9. Medical offices (physician, dentistry, optometry)
10. Public schools (non-senior projects only)
11. Senior center
12. Religious institution- eligible for only one point
13. Licensed day care services (non-senior projects only)
14. Post office, city hall, county courthouse
15. Fire/police station
16. Location within a brownfield site; and
17. A redevelopment project

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

NEW MEXICO

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	o			o	o	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The New Mexico Mortgage Finance Authority’s (MFA) 2018 Qualified Allocation Plan (QAP) includes implicit preferences for opportunity.

Explicit Definition of Opportunity: MFA’s 2018 QAP does not include an explicit preference for opportunity.

Implicit Definition of Opportunity: MFA’s 2018 QAP gives preference to Locational Efficiency Projects located in proximity and connected to 1) services and 2) public transportation are eligible for four points. Projects located in proximity and connected to 1) services or 2) public transportation are eligible for up to two points for each of these criteria. Public transportation must be established and provided on a fixed route with scheduled service. Alternative forms of transportation may be acceptable provided sufficient documentation is provided that establishes the alternate form of transportation is acceptable to MFA. A future promise to provide service does not satisfy this scoring criterion.

- Proximity to Services Locate the project within these set distances from the designated number of facilities in the table below: - Suburban / Mid-Size Towns: a 0.5-mile walk distance of at least three, or a 1-mile walk distance of at least six facilities - Rural / Tribal / Small Towns: 2 miles of at least two facilities (except for projects located on tribal lands, in colonias communities, or in communities of population less than 10,000)

Retail	Services	Civic and Community Facilities
<ul style="list-style-type: none"> -Supermarket -Other food store with produce -Farmers market -Clothing store or department store selling clothes -Hardware store -Pharmacy -Other retail 	<ul style="list-style-type: none"> -Bank -Gym, health club, exercise studio -Hair care -Laundry, dry cleaner -Restaurant, cafe, diner 	<ul style="list-style-type: none"> -Adult or senior care (licensed) -Child care (licensed) -Community or recreation center -Cultural arts facility (museum, performing arts) -Educational facility (including K-12 school, university, adult education center, vocational school, community college) -Entertainment venue (theater, sports) -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 -Social services center

MFA’s 2018 QAP gives preference for access to public transportation:

- Suburban / Mid-Size Towns Locate project within a 0.5-mile walk distance of combined transit services (bus, rail, and ferry) constituting at least 60 or more transit rides per weekday, and some type of weekend ride option
- Rural / Tribal / Small Towns Locate project within a 5-mile distance of the following transit options: 1) vehicle share program; 2) dial-a-ride program; 3) employer vanpool; and 4) public-private regional transportation

Preference is also given for Walkable Neighborhoods Connect the project to public and open spaces and adjacent development by providing at least three separate connections (excluding entrances /exits from a single building) from the project to sidewalks or pathways in surrounding neighborhoods and natural areas. Types of connections can include bike trails, sidewalks, footpaths, and the like.

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

NEW YORK

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	●		●			Explicit	Opportunity is mappable statewide by a third party using metrics provided

A legend for this table can be found on page 18.

The New York City Department of Housing Preservation and Development’s (NYCHPD) 2017 Qualified Allocation Plan (QAP) includes an explicit preference for opportunity. Additionally, the current definition of opportunity is mappable statewide by a third party using metrics provided.

Explicit Definition of Opportunity:

NYCHPD has included an explicit definition of opportunity under “Project Characteristics”

- Targeted areas – located in an area defined by HPD as an area of special need. Projects located in QCTs will receive bonus points
- *High Opportunity Neighborhoods* (3 points) – projects that increase housing opportunities to low-income households. High performing schools, low crime, or less than 10% poverty
- Difficult to develop projects – projects that are acquired from the city due to foreclosure or have special circumstances that make it difficult to develop
- Tenant Ownership – scored on whether the sponsor has committed to eventual tenant ownership
- Historic – projects where an existing building is landmarked
- Preservation projects

Implicit Definition of Opportunity:

There were no implicit references to opportunity.

Mapping Feature: Opportunity is mappable statewide by a third party using crime, poverty, and school performance data.

NORTH CAROLINA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	o		o	o		Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The North Carolina Housing Finance Agency’s (NCHFA) 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, the current definition of opportunity does not provide sufficient metrics to be mapped statewide.

Explicit Definition of Opportunity: There were no explicit mentions of opportunity within the QAP.

Implicit Definition of Opportunity:

NCHFA includes an implicit reference to opportunity in its Scoring metrics under “Amenities”

Amenities (38 points) – The QAP lists establishments that qualify under the below categories

- Grocery
- Shopping
- Pharmacy
- Service
- Healthcare
- Public Facility
- Public School
- Senior Center
- Retail

Additionally, the QAP mentions certain rent affordability thresholds that offer points:

- (a) High Income County
 - a. 2 points if 25% of units are affordable at 30% AMI
- (b) Moderate Income County
 - a. 2 points if 25% of units are affordable at 40% AMI
- (c) Low-Income County
 - a. 2 points if 25% of units are affordable at 50% AMI

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

NORTH DAKOTA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No						N/A	N/A

A legend for this table can be found on page 18.

The North Dakota Housing Finance Agency’s (NDHFA) 2018 Qualified Allocation Plan (QAP) does not include explicit or implicit preferences for opportunity.

Explicit Definition of Opportunity: N/A

Implicit Definition of Opportunity: N/A

Mapping Feature: N/A

OHIO

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	Yes	•	•	•	•	•	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Ohio Housing Finance Agency’s (OHFA) 2018 Qualified Allocation Plan (QAP) includes an explicit preference for opportunity. Additionally, the current definition of opportunity is already mapped statewide.

Explicit Definition of Opportunity:

a. Defined by the USR Opportunity Index. The Opportunity index utilizes a number of indicators to identify the many dimensions of strong, vibrant and healthy communities and will be used to identify areas of opportunity, particularly regarding the siting of family housing, in Ohio. Analyzing differences in access to opportunity structures is in alignment with state and federal initiatives to further Fair Housing, deconcentrate poverty and maximize equitable outcomes for low-income households.

b. Among many others, there are Five Primary Indicators: Transportation Opportunity, Educational Opportunity, Employment Opportunity, Housing Opportunity, and Health Opportunity.

A detailed overview of the index can be found [here](#).

Implicit Definition of Opportunity:

All mentions of opportunity were deemed to be explicit.

Mapping Feature: Opportunity is already mapped statewide

<http://kirwan.maps.arcgis.com/home/webmap/viewer.html?webmap=34534ecec2c94eba83080e9957ce1ef0>

OKLAHOMA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No			•			Explicit	Opportunity is readily mappable statewide from the metrics provided

A legend for this table can be found on page 18.

The Oklahoma Housing Finance Agency’s (OHFA) 2018 Qualified Allocation Plan (QAP) includes an explicit preference for opportunity. Using the metrics provided in the QAP, opportunity is readily mappable statewide.

Explicit Definition of Opportunity: Under the category of Development Location, OHFA’s 2018 QAP awards points for properties located in High Opportunity Areas, which is measured using either poverty levels or income, but not both. For more details, on OHFA’s methodology, see the Mapping Feature section, below.

Implicit Definition of Opportunity: OHFA’s 2018 QAP awards points for proposed properties that contributes to the deconcentration of Housing Credit properties and those in areas experiencing population growth.

- Points will be awarded to proposed Developments in a City or Town in which no 9% LIHTC Awards have been made in the two (2) year period preceding this Application’s date of consideration
 - For this requirement, a year will run from the month of the Trustees meeting to the same month the next year. For example: if a Development is awarded Credits in a City/Town in November 2015, only Applications to be considered **AFTER** November 2017 will be eligible to receive these points for the same City/Town (assuming no awards were made in the interim).
 - For Developments that are proposed in unincorporated areas, the unincorporated area will be considered part of the City or Town in which it’s mailing address is listed.
 - Points will be awarded if the Applicant provides proof the proposed Development is not within a three (3) mile radius of any Development that was awarded within the two (2) year period preceding the Application’s month of consideration whether the previously awarded Development is within the same city as the proposed property or not. A map clearly indicating the location of Tax Credit Properties within the City and surrounding Cities and the number of miles between the proposed property and other Tax Credit Developments. No map needed if no Developments awarded in area.

- *Population Growth – up to 3 Points*

- The total population growth for the last three (3) years (using the most recent published year) for the County in which the development is located. The total growth percentage must be equal to or exceed 2.5% for the three year period. No rounding. **OR**
- The total population growth for the last three (3) years (using the most recent published year), for the Town or City in which the development is located. The total growth percentage must be equal to or exceed 2.5% for the three year period. No rounding.

Mapping Feature: Opportunity is readily mappable statewide from the metrics provided.

By using the http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml points will be awarded if all of the development is in qualifying areas.

- Input Oklahoma in the box, and then click poverty. This will give the latest percentage of poverty for the State. Then input the zip code of the Development. If the zip code is not known, then enter the smallest geographic area known, and then click poverty.
- If the percentage is less than the State poverty level, then the Development is eligible for 5 points. o Provide State level printout and Development specific printout.

--- OR ---

- Input Oklahoma in the box, and then click income. This will give the latest median household income for the State. Then input the zip code of the Development. If the zip code is not known, then enter the smallest geographic area known, and then click income.
- If the median household income is more than the State Median Household Income, then the Development is eligible for 5 points.
- Provide State level printout and Development specific printout

If the percentage is *less* than the State poverty level - 5 points.

If the median household income is **more** than the State Median Household Income – 5 points

OREGON

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2016	Yes	●	●	●	○	○	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

Oregon Housing and Community Services’ (OHCS) 2016 Qualified Allocation Plan (QAP) includes both implicit and explicit preferences for opportunity. Additionally, a statewide mapping tool of these incentives is available.

Explicit Definition of Opportunity: OHCS’s 2016 QAP’s selection criteria includes points for being located in an Opportunity Area, defined as:

- *Low Poverty Census Tract*; 2 points: Low Poverty Census Tract; poverty rate in Tract lower than the region,
- *High Ratio of Jobs to Population*; 2 points: High Ratio of Jobs to Population; ratio of jobs to population in Tract higher than that in the region,
- *Below Average Unemployment*; 2 points: Below Average Unemployment; unemployment rate in Tract lower than the region,
- *High Scoring Schools*; 2 points: High Scoring Schools; assigned Elementary school has a score of 4 or 5

If not claiming the points awarded as part of an Opportunity Area, applicants can choose to receive points under the category of Vulnerable Gentrification Area, define as:

- *Revitalization Plan*; existing planning efforts are required to get points in this section. Describe the Revitalization Plan in effect for the project site area; this will be reviewed by Scoring Committee to determine eligibility for Vulnerable Gentrification Area points. Preference is for established and documented plans, though accommodation for concerted revitalization efforts in rural communities without significant planning efforts may be made at Scoring Committee discretion,
- *Qualified Census Tract*; Two (2) points,
- *High Percentage Communities of Color*; Two (2) points; Concentration of race / ethnicities; rates of non-white-non-Hispanic in Tract above that in the Region,
- *High Percentage Low Educational Achievement*; Two (2) points; Concentration of low educational achievement; rates of non-college degree higher in Tract than that in the Region,
- *High Percentage Renters*; Two (2) points; Concentration of renters; rates of renters in Tract higher than that in the Region.

Implicit Definition of Opportunity: OHCS's 2018 QAP measures need and impact, both of which contain implicit preferences to opportunity, in its scoring criteria as follows:

- Need (20 points), includes:
 - Severity of Need:
 - Population Growth Rate;
 - Rental Housing Age,
 - Severe Housing Burden (spending 50% or more of household income on housing expenses) Rate;
 - If New Construction or Acquisition / Rehab: Affordable Housing Gap (difference between the supply of affordable housing and the target population in need of housing);
 - If Preservation: Community Affordable Housing Percent (the percentage of the community's affordable housing stock the Project represents)
 - Equitably served geography: Need Distribution of Affordable Housing Units vs. Actual Distribution of Affordable Housing Units. A data-based calculation that is used to distribute LIHTC funding across Geographic Regions, as well as evaluate the equitable distribution of funded affordable housing. It is based on most recent five (5) year American Community Survey data. The formula equally weights the number of renter households earning sixty percent (60%) of county median family income and the number of severely rent burdened (fifty percent (50%) or more of income on housing) households.
- Impact (40 points), including (below applies to new contraction, rehab/acq, and preservation):
 - Location Efficiency
 - *Walk-ability*: score from <http://www.walkscore.com/cities-and-neighborhoods/>; two (2) points if 70+, one (1) point if 50-69;
 - *Food access*: two (2) points if grocery store within a half a mile / within 5 miles if rural, one (1) point if not in a USDA Food Desert <http://www.ers.usda.gov/dataproducts/food-access-research-atlas/go-to-the-atlas.aspx#.Uw9-EOOwI5I>
 - *Medical access*: two (2) points if available within 1 mile / within 5 miles if rural, one (1) point if within 5 miles / 10 miles if rural,
 - *Public transit*: two (2) points if available within ¼ mile or a Transit Score from <http://www.walkscore.com/cities-and-neighborhoods/> of 70+ / within 5 miles if rural, one (1) point if within ½ mile or Transit Score of 50+ / within 10 miles if rural,
 - *Education for family housing*: two (2) points if schools or libraries are within ½ mile / within 5 miles if rural, one (1) point if schools or libraries are within 1 mile / 10 miles if rural.

Mapping Feature: Opportunity is already mapped statewide. Access the OHCS mapping tool here:

<http://geo.maps.arcgis.com/apps/webappviewer/index.html?id=0eb269a1e6be46bc8b07cb90f3b5851c>

PENNSYLVANIA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017 - 2018	No	•	•	•	•	○	Explicit	Opportunity is readily mappable statewide from the metrics provided

A legend for this table can be found on page 18.

The Pennsylvania Housing Finance Agency’s (PHFA) 2017-2018 Qualified Allocation Plan (QAP) includes explicit and implicit preferences for opportunity.

Explicit Definition of Opportunity: PHFA’s 2017-2018 QAP reserves Housing Credits to, at a minimum, three developments under the heading of Areas of Opportunity. These are defined as developments within the Suburban/Rural Pool only 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.

Additionally, PHFA’s 2017-2018 QAP awards up to 18 points for Areas of Opportunity, measured by:

- 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

Up to 2 points to General Occupancy projects for school performance standards, measured as those developments located in a school district whose senior high school scores the following Building Level Academic Score set forth in the Pennsylvania State Performance Profile listed at <http://www.paschoolperformance.org/>.

Percentage	Points
≥70% - 80%	1
>80%	2

While Senior Occupancy projects are not eligible for points related to School Performance, they are eligible for points for, among other things, close proximity to amenities for the senior population, including health and retail establishments, home health agencies, and hospitals.

Implicit Definition of Opportunity: PHFA's 2017-2018 QAP awards up to 2 points to developments located within one-half mile of a completed or planned public transportation fixed route stop.

Mapping Feature: Opportunity is readily mappable statewide from the metrics provided

RHODE ISLAND

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018 - 2019	No	o	o		o	o	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

Rhode Island Housing’s (RIHousing) 2018-2019 Qualified Allocation Plan (QAP) includes implicit preferences for opportunity.

Explicit Definition of Opportunity: RIHousing’s 2018-2019 QAP does not include explicit preferences for opportunity.

Implicit Definition of Opportunity: Recognizing that “a community is more than homes; it includes different elements critical for high quality of life,” RIHousing’s 2018-2019 awards points to, among other community amenities, developments within 2 miles of RIPTA or MBTA public transit service. Alternatively, development has access to no or low-cost transportation services available to all residents which can be documented with a letter or agreement with the provider.

RIHousing also prioritizes access to public infrastructure, including developments situated in an existing or proposed Growth Center, or, within 1 mile of existing public infrastructure such as hospitals, schools, libraries, community centers, etc. within the Urban Services Boundary (USB) as defined by GrowSmartRI and 2.5 miles for non-USB areas. For the definition of USB please see <http://www.growsmartri.org/>.

Points are available to developments within 1 mile of employment opportunities, as well as for developments is located within a community with less than 10% affordable housing as defined by state law **OR** a development in an exempt community with less than 10% affordable housing as defined by state law.

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

SOUTH CAROLINA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017-2018	No	o			o	o	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The SC State Housing Finance and Development Authority’s (SCHousing) 2017-2018 Qualified Allocation Plan (QAP) includes implicit preferences for opportunity.

Explicit Definition of Opportunity: SCHousing’s 2017-2018 QAP does not includes an explicit preference for opportunity.

Implicit Definition of Opportunity: SCHousing’s 2017-2018 QAP awards points awarded as listed below for services located with ½ mile, 1 miles, 1 ½ miles, 2 miles, 2 ½ miles, or 3 miles of the proposed site as indicated by public paved road existing at the time the application is submitted accessible to the public for motor vehicular use, as measured by Google Maps or similar distance calculating systems.

Only one of each service type will be counted for points. All positive site services must be available and accessible to the general public, be open and operations for the designated purpose of the service (meaning the general public has immediate access to and use of the service), and be expected to continue to be open and operational, at the time of the Authority’s site visit is made or points will not be awarded.

Services	½ mile	1 mile	1 ½ miles	2 miles	2 ½ miles	3 miles
Full Service Grocery Store	4	3.5	3	2.5	2	1.5
Pharmacy or Drug Store	4	3.5	3	2.5	2	1.5
Convenience Store and Gas Station	3	2.5	2	1.5	1	.5
Entertainment Venues: ONLY the follow count for points: museums, cinemas, public libraries, bowling alleys, skating rinks, miniature golf,	3	2.5	2	1.5	1	.5

college or professional sporting event venues, water parks, zoos, bingo halls.						
Retail Shopping Areas	3	2.5	2	1.5	1	.5
Doctor's Office/Medical Office	3	2.5	2	1.5	1	.5
Public Schools	3	2.5	2	1.5	1	.5
Fire Station				1.5	1	.5
Full Service Banks or Credit Unions	3	2.5	2	1.5	1	.5
Public Park or Playground	3	2.5	2	1.5	1	.5

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

SOUTH DAKOTA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017	Yes	•	•	•			Explicit	Opportunity is readily mappable statewide from the metrics provided

A legend for this table can be found on page 18.

The South Dakota Housing Development Authority’s (SDHDA) 2017 Qualified Allocation Plan (QAP) includes an explicit preference for opportunity. Additionally, using metrics provided, opportunity can be mapped statewide.

Explicit Definition of Opportunity:

SDHDA includes an explicit reference to opportunity in their “Project Location” Preferences

- Projects located in close proximity (.5 mile) of community services and areas of opportunity will be eligible for up to 40 points
 - Community services:
 - Grocery/retail stores
 - Hospital/medical clinics
 - Schools/senior center
 - Special service offices
 - Project that has a bus stop within one city block or provides free transportation to the tenants on a regular basis
 - *Area of opportunity:*
 - Low poverty census tracts – less than 10% poverty rate
 - High ratio of jobs to population – above state average ratio
 - Below average unemployment – less than the state unemployment rate
 - High scoring schools – above average school performance

Implicit Definition of Opportunity:

All mentions of opportunity were deemed to be explicit.

Mapping Feature: SDHDA provides census tract-level data that meet the identified criteria above for poverty rate, jobs and population, and unemployment rate. As a result, opportunity is readily mappable statewide from the metrics provided.

TENNESSEE

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2017	No		o				Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Tennessee Housing Development Agency’s (THDA) 2017 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, the current definition of opportunity does not provide sufficient metrics to be mapped statewide.

Explicit Definition of Opportunity: No explicit reference to opportunity

Implicit Definition of Opportunity:

- Tennessee Growth Policy Act – located in a county with a growth plan approved by the state

Mapping Feature:

The current definition of opportunity does not provide sufficient metrics to be mapped statewide

TEXAS

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	•		•	•	•	Explicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Texas Department of Housing & Community Affairs’ (TDHCA) 2018 Qualified Allocation Plan (QAP) includes explicit preferences for opportunity.

Explicit Definition of Opportunity: THDCA’s 2018 QAP includes an Opportunity Index, for which development can score up to 7 points, defined as follows:

(A) A proposed Development is eligible for up to two (2) opportunity index points if it is located entirely within a census tract with a poverty rate of less than the greater of 20% or the median poverty rate for the region and meets the requirements in (i) or (ii) below.

(i) The Development Site is located entirely within a census tract that has a poverty rate of less than the greater of 20% or the median poverty rate for the region and a median household income rate in the two highest quartiles within the uniform service region. (2 points)

(ii) The Development Site is located entirely within a census tract that has a poverty rate of less than the greater of 20% or the median poverty rate for the region, with a median household income in the third quartile within the region, and is contiguous to a census tract in the first or second quartile, without physical barriers such as highways or rivers between, and the Development Site is no more than 2 miles from the boundary between the census tracts. For purposes of this scoring item, a highway is a limited-access road with a speed limit of 50 miles per hour or more; and, (1 point)

(B) An Application that meets the foregoing criteria may qualify for additional points for any one or more of the following factors. Each amenity may be used only once for scoring purposes, unless allowed within the scoring item, regardless of the number of categories it fits. All members of the Applicant or Affiliates cannot have had an ownership position in the amenity or served on the board or staff of a nonprofit that owned or managed that

amenity within the year preceding the Pre-Application Final Delivery Date. All amenities must be operational or have started Site Work at the Pre-Application Final Delivery Date. Any age restrictions associated with an amenity must positively correspond to the target population of the proposed Development.:

(i) For Developments located in an Urban Area (other than Applicants competing in the USDA Set-Aside), an Application may qualify to receive points through a combination of requirements in subclauses (I) through (XIV) of this clause.

(I) The Development Site is located on a route, with sidewalks for pedestrians, that is 1/2 mile or less from the entrance to a public park with a playground. The entirety of the sidewalk route must consist of smooth hard surfaces, curb ramps, and marked pedestrian crossings when traversing a street. (1 point)

(II) The Development Site is located on a route, with sidewalks for pedestrians, that is 1/2 mile or less from the entrance of a public transportation stop or station with a route schedule that provides regular service to employment and basic services. The entirety of the sidewalk route must consist of smooth hard surfaces, curb ramps, and marked pedestrian crossings when traversing a street. For purposes of this scoring item, regular is defined as scheduled service beyond 8 a.m. to 5 p.m., plus weekend service (both Saturday and Sunday). (1 point)

(III) The Development Site is located within 1 mile of a full-service grocery store. A full service grocery store is a store of sufficient size and volume to provide for the needs of the surrounding neighborhood including the proposed Development; and the space of the store is dedicated primarily to offering a wide variety of fresh, frozen, canned and prepared foods, including but not limited to a variety of fresh meats, poultry, and seafood; a wide selection of fresh produce including a selection of different fruits and vegetables; a selection of baked goods and a wide array of dairy products including cheeses, and a wide variety of household goods, paper goods and toiletry items. (1 point)

(IV) The Development Site is located within 1 mile of a pharmacy. For the purposes of this menu item only, the pharmacy may be claimed if it is within the same building as a grocery store. (1 point)

(V) The Development Site is located within 3 miles of a health-related facility, such as a full service hospital, community health center, minor emergency center, emergency room or urgent care facility. Physician offices and physician specialty offices are not considered in this category. (1 point)

(VI) The Development Site is within 2 miles of a center that is licensed by the Department of Family and Protective Services ("DFPS") specifically to provide a school-age program or to provide a child care program for infants, toddlers, and/or pre-kindergarten. The Application must include evidence from DFPS that the center meets the above requirements. (1 point)

(VII) The Development Site is located in a census tract with a property crime rate of 26 per 1,000 persons or less as defined by neighborhoodscout.com, or local law enforcement data sources. If employing the latter source, the formula for determining the crime rate will include only data relevant to the census tract in which the Development Site is located. (1 point)

(VIII) The development Site is located within 1 mile of a public library that has indoor meeting space, physical books that can be checked out and that are of a general and wide-ranging subject matter, computers and internet access, and that is open 50 hours or more per week. The library must not be age or subject-restricted and must be at least partially funded with government funding. (1 point)

(IX) The Development Site is located within 5 miles of an accredited university or community college, as confirmed by the Texas Higher Education Coordination Board (“THECB”). To be considered a university for these purposes, the provider of higher education must have the authority to confer bachelor’s degrees. Two-year colleges are considered community colleges, and to be considered for these purposes must confer at least associate’s degrees. The university or community college must have a physical campus, where classes are regularly held for students pursuing their degrees, within the required distance; online-only institutions do not qualify under this item. (1 point)

(X) Development Site is located in a census tract where the percentage of adults age 25 and older with an Associate's Degree or higher is 27% or higher as tabulated by the 2011-2015 American Community Survey 5-year Estimate. (1 point)

(XI) Development Site is within 1 mile of an indoor recreation facility available to the public. Examples include a gym, health club, a bowling alley, a theater, or a municipal or county community center. (1 point)

(XII) Development Site is within 1 mile of an outdoor, dedicated, and permanent recreation facility available to the public. Examples include swimming pools or splash pads, tennis courts, golf courses, softball fields, or basketball courts. (1 point)

(XIII) Development Site is within 1 mile of community, civic or service organizations that provide regular and recurring substantive services available to the entire community (this could include religious organizations or organizations like the Kiwanis or Rotary Club as long as they make services available without regard to affiliation or membership). (1 point)

(XIV) Development Site is in the current service area of Meals on Wheels or similar nonprofit service that provides regular visits and meals to individuals in their homes. (1 point)

(ii) For Developments located in a Rural Area and any Application qualifying under the USDA set-aside, an Application may qualify to receive points through a combination of requirements in subclauses (I) through (XIII) of this clause.

- (I) The Development Site is located within 4 miles of a full-service grocery store. A full service grocery store is a store of sufficient size and volume to provide for the needs of the surrounding neighborhood including the proposed Development; and the space of the store is dedicated primarily to offering a wide variety of fresh, frozen, canned and prepared foods, including but not limited to a variety of fresh meats, poultry, and seafood; a wide selection of fresh produce including a selection of different fruits and vegetables; a selection of baked goods and a wide array of dairy products including cheeses, and a wide variety of household goods, paper goods and toiletry items. (1 point)
- (II) The Development Site is located within 4 miles of a pharmacy. For the purposes of this menu item only, the pharmacy may be claimed if it is within the same building as a grocery store. (1 point)
- (III) The Development Site is located within 4 miles of health-related facility, such as a full service hospital, community health center, or minor emergency center. Physician offices and physician specialty offices are not considered in this category. (1 point)
- (IV) The Development Site is located within 4 miles of a center that is licensed by the Department of Family and Protective Services (“DFPS”) specifically to provide a school-age program or to provide a child care program for infants, toddlers, and/or pre-kindergarten. The Application must include evidence from DFPS that the center meets the above requirements. (1 point)
- (V) The Development Site is located in a census tract with a property crime rate 26 per 1,000 or less, as defined by neighborhoodscout.com, or local law enforcement data sources. If employing the latter source, the formula for determining the crime Page 25 of 40 rate will include only data relevant to the census tract in which the Development Site is located. (1 point)
- (VI) The Development Site is located within 4 miles of a public library that has indoor meeting space, physical books that can be checked out and that are of a general and wide-ranging subject matter, computers and internet access, and that is open 40 hours or more per week. The library must not be age or subject-restricted and must be at least partially funded with government funding. (1 point)
- (VII) The Development Site is located within 4 miles of a public park with a playground. (1 point)
- (VIII) The Development Site is located within 15 miles of an accredited university or community college, as confirmed by the Texas Higher Education Coordination Board (“THECB”). To be considered a university for these purposes, the provider of higher education must have the authority to confer bachelor’s degrees. Two-year colleges are considered community colleges, and to be considered for these purposes must confer at least associate’s degrees. The university or community college must have a physical campus, where classes are regularly held for students pursuing their degrees, within the required distance; online-only institutions do not qualify under this item. (1 point)

- (IX) Development Site is located in a census tract where the percentage of adults age 25 and older with an Associate's Degree or higher is 27% or higher. (1 point)
- (X) Development Site is within 3 miles of an indoor recreation facility available to the public. Examples include a gym, health club, a bowling alley, a theater, or a municipal or county community center. (1 point)
- (XI) Development Site is within 3 miles of an outdoor, dedicated, and permanent recreation facility available to the public. Examples include swimming pools or splash pads, tennis courts, golf courses, softball fields, or basketball courts. (1 point)
- (XII) Development Site is within 3 miles of community, civic or service organizations that provide regular and recurring substantive services available to the entire community (this could include religious organizations or organizations like the Kiwanis or Rotary Club as long as they make services available without regard to affiliation or membership). (1 point)
- (XIII) Development Site is in the current service area of Meals on Wheels or similar nonprofit service that provides regular visits and meals to individuals in their homes. (1 point)

In the event that there are applications that receive the same number of points in any given set-aside category, preference will be given to applications scoring higher on the Opportunity Index. Additionally, developments meeting the criteria of the Opportunity Index are eligible for a 30% basis boost.

Implicit Definition of Opportunity: THCDA's 2018 QAP does not include an implicit preference for opportunity.

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide.

UTAH

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	Yes	●	●	●		○	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Utah Housing Corporation’s (UHC) 208 Qualified Allocation Plan (QAP) includes explicit and implicit preferences for opportunity. The preferences are mapped statewide.

Explicit Definition of Opportunity: UHC’s 2018 QAP awards points to projects located in census tracts with strong social equity indicators. Salt Lake County, Utah County, Davis County, and Weber County have mapped all census tracts by an Opportunity Index. Developed by James Wood of the Kem C. Gardner Policy Institute, the Opportunity Index compiles rankings based on five factors: school proficiency, job access, labor market engagement, poverty, and housing stability. Projects located in one of these counties will receive points as follows:

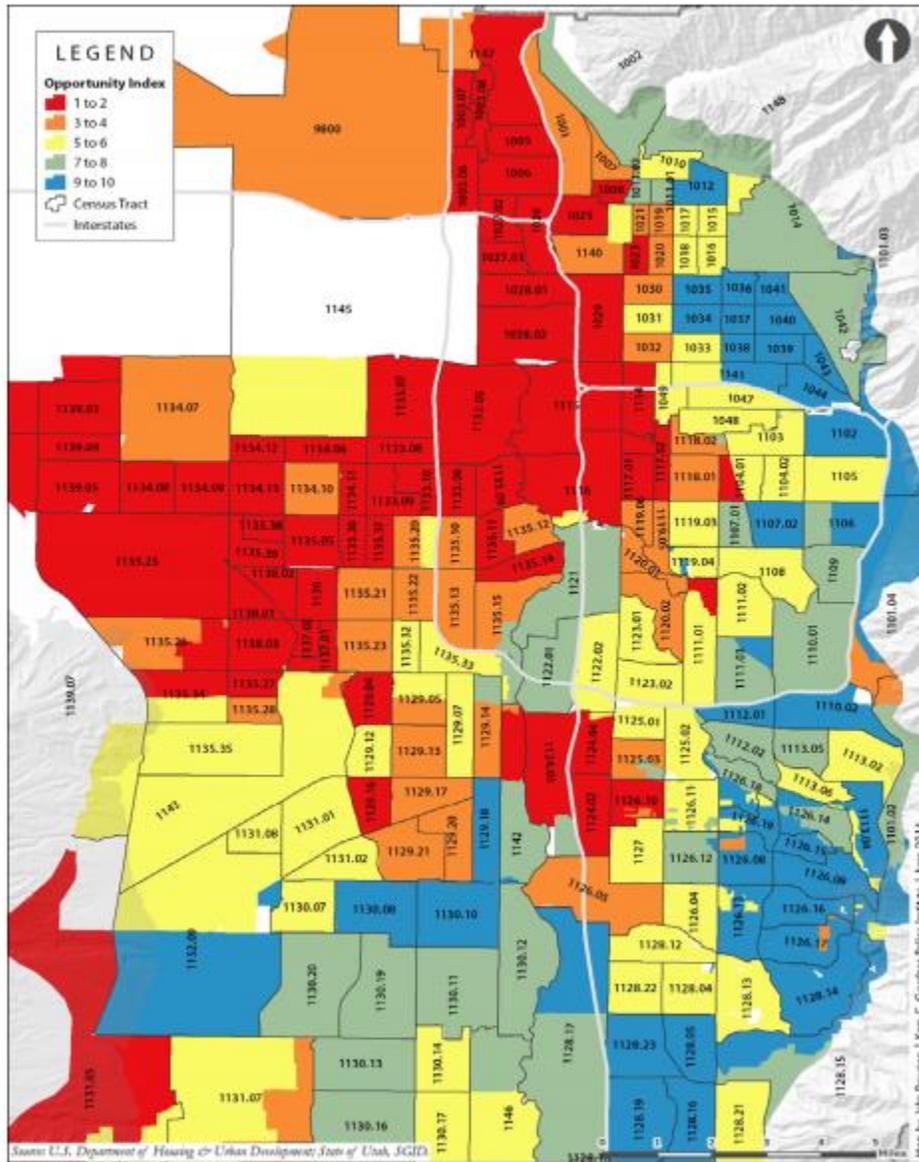
Opportunity Index Score	Number of Points
1-2	0 points
3-4	20 points
5-6	40 points
7-8	60 points
9-10	80 points

Projects located outside of Salt Lake County, Utah County, Davis County, and Weber County will receive 80 points if the census tract poverty rate is below 10.0%. This will be measured using the 2016 data found here: <https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx>. If the percent below poverty line is 10.0% or more, no points will be awarded to the project Application.

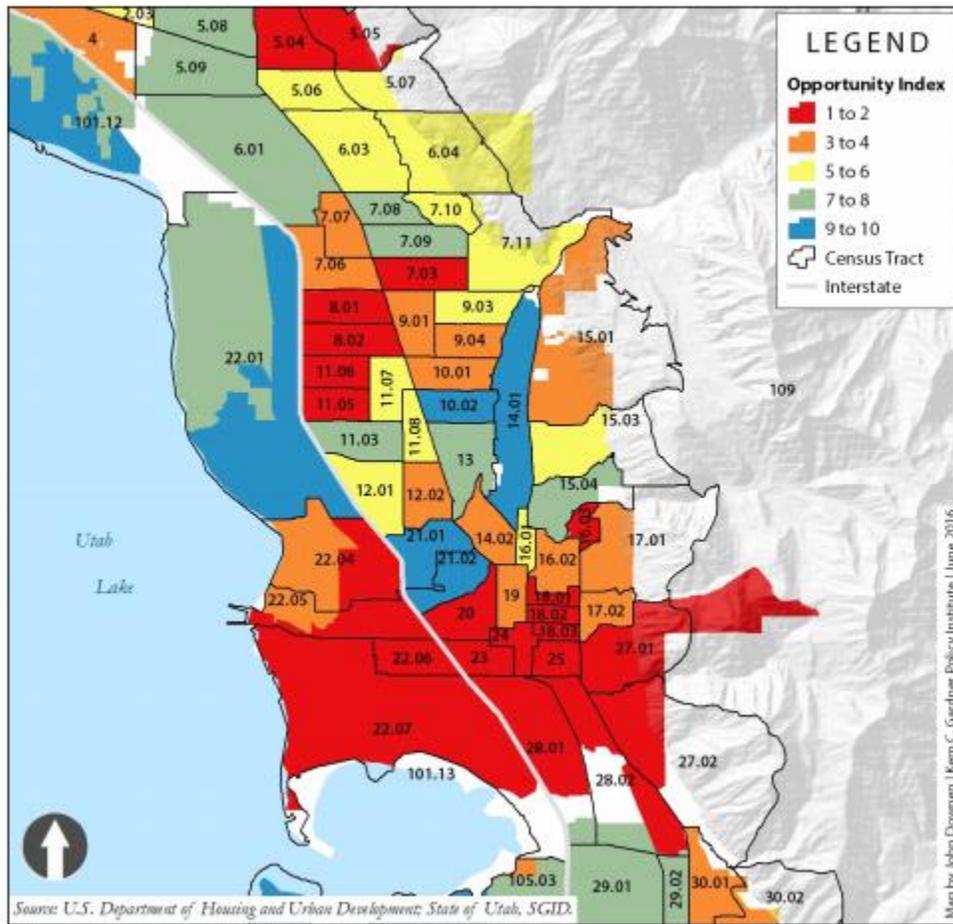
Implicit Definition of Opportunity: UHC’s 2018 QAP awards points to projects located within 1/3 of a mile of FrontRunner or TRAX OR bus stop along core route or within 1/3 of a mile of bus stop along core route.

Mapping Feature: Opportunity is already mapped for Salt Lake County, Utah County, Davis County, and Weber County. (See UHC maps below.) For projects located outside of these counties, data used to determine a project’s Opportunity points is accessible here: <https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx>.

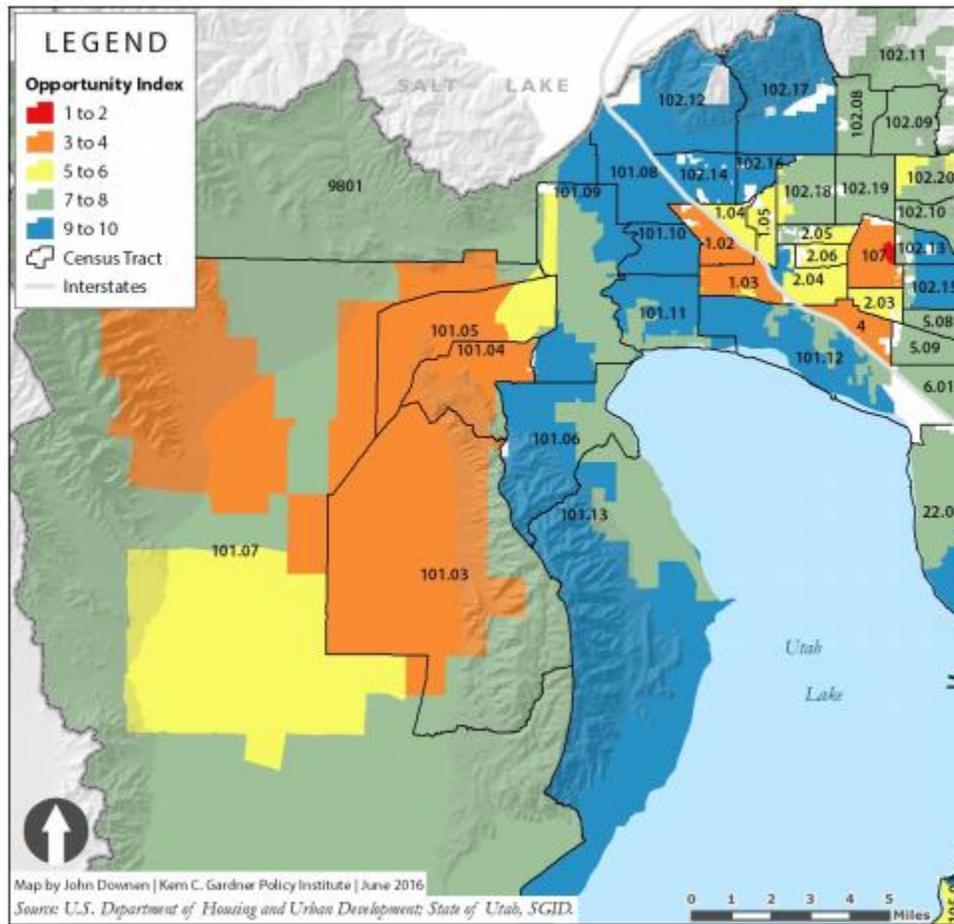
Salt Lake County Opportunity Index Tracts



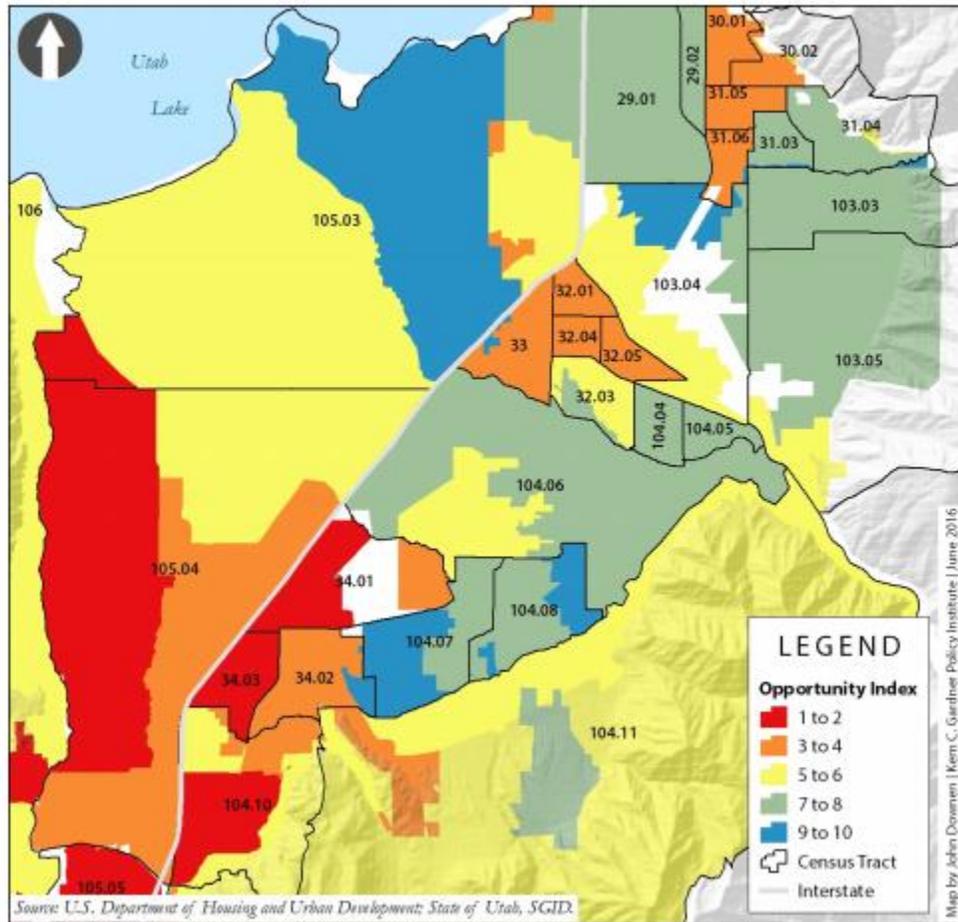
Utah County Northeast Opportunity Index Tracts



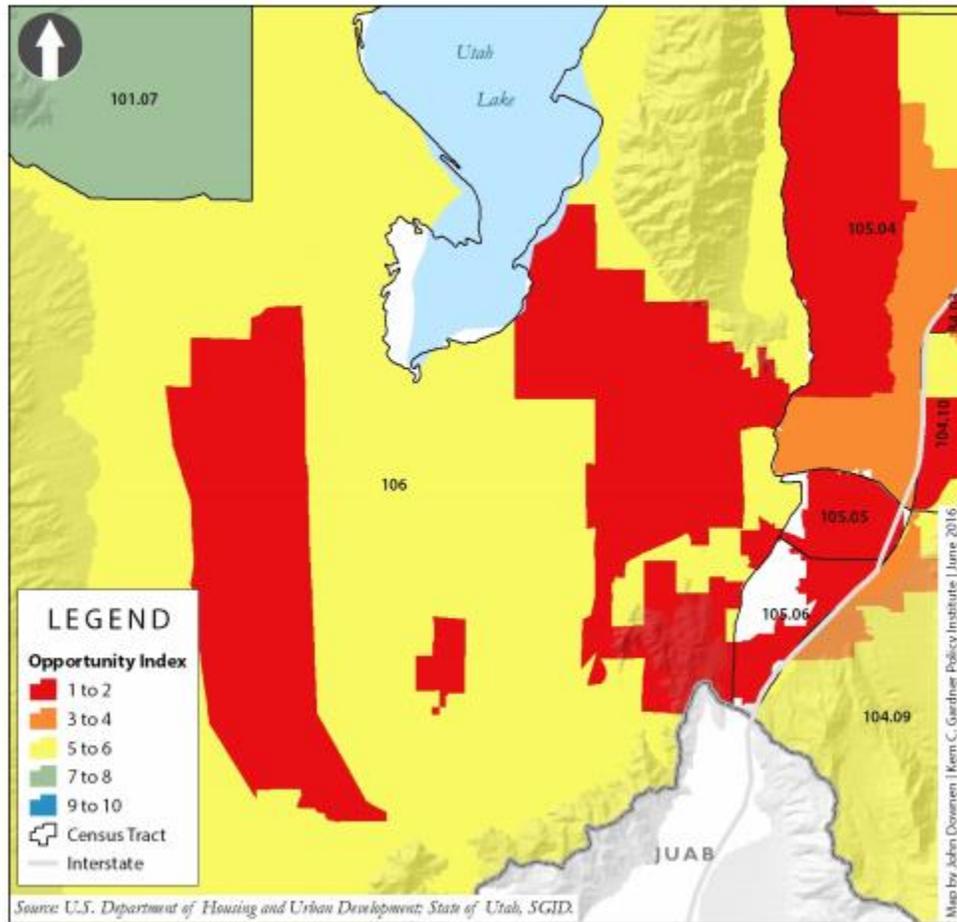
Utah County Northwest Opportunity Index Tracts



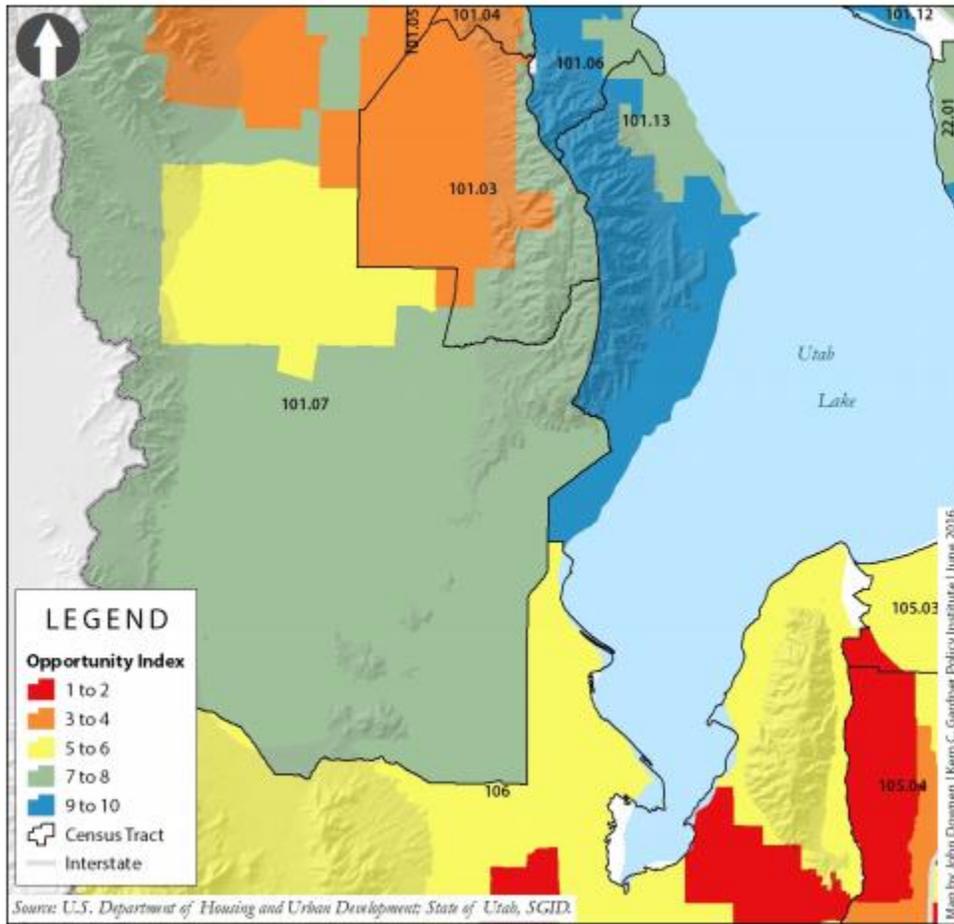
Utah County Southeast Opportunity Index Tracts



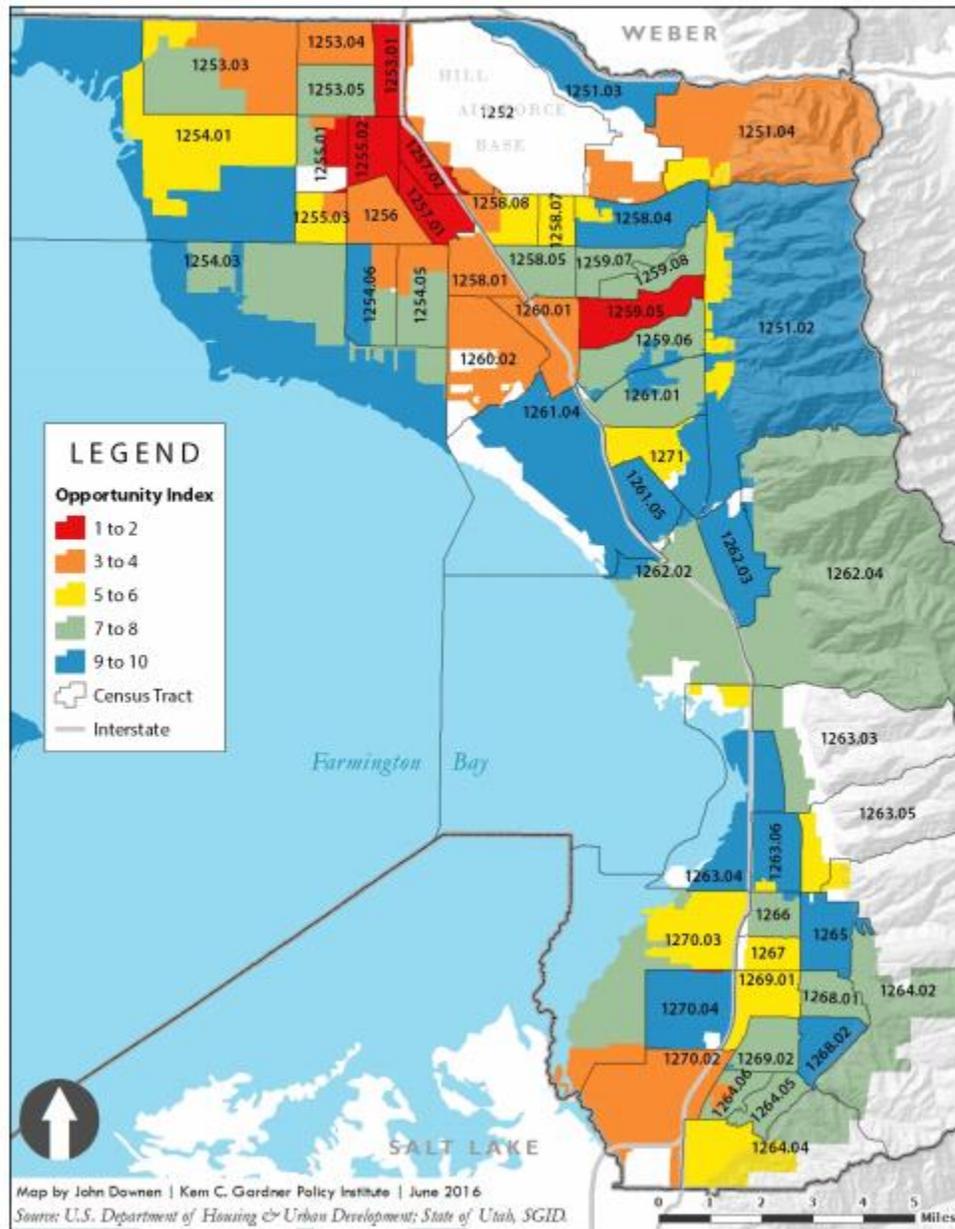
Utah County South Opportunity Index Tracts



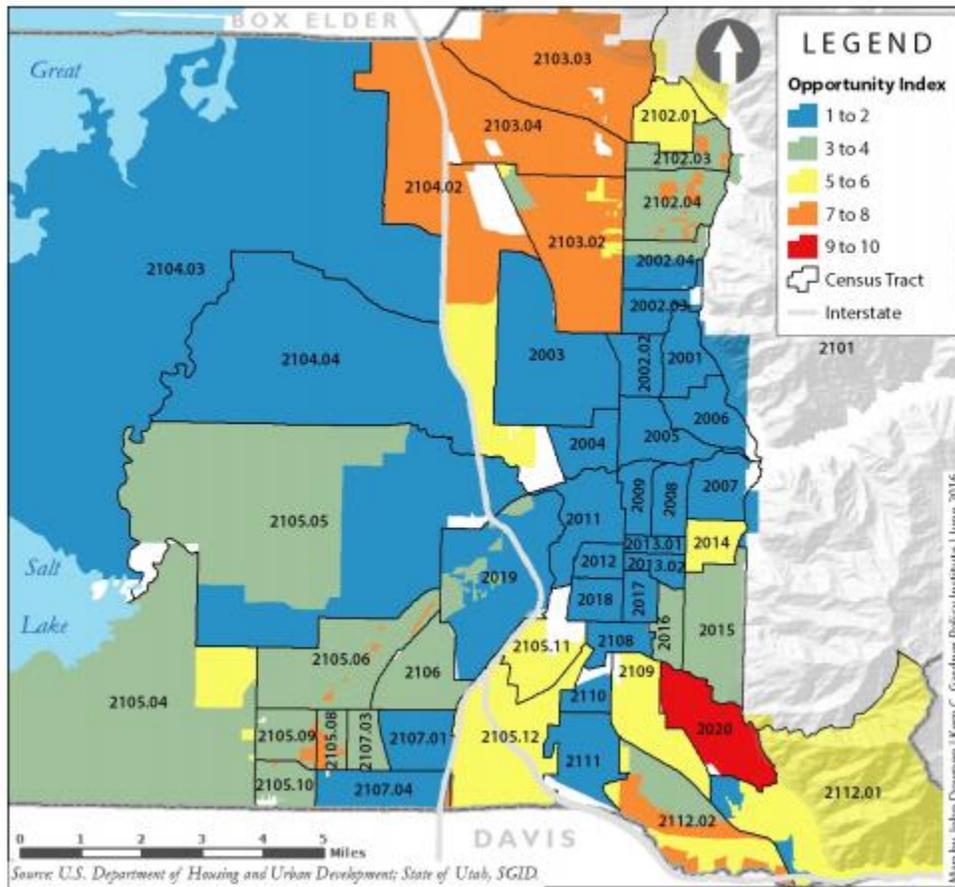
Utah County Southwest Opportunity Index Tracts



Davis County Opportunity Index Tracts



Weber County Opportunity Index Tracts



VERMONT

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No					o	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Vermont Housing Finance Agency’s (VHFA) 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity.

Explicit Definition of Opportunity: VHFA’s 2018 QAP does not include an explicit preference for opportunity.

Implicit Definition of Opportunity: VHFA staff will consider all applications submitted under the 2018 QAP together and will assign weight to a variety of project and/or sponsor characteristics as outlined below. This weight will be used to rank the projects and that ranking will be the primary staff consideration in making recommendations to the VHFA Board. Projects with Access to Public Transportation will receive two checkmarks. 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.

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

VIRGINIA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	Yes			o			Implicit	Opportunity is mappable statewide by a third party using metrics provided

A legend for this table can be found on page 18.

The Virginia Housing Development Authority’s (VHDA) 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, using metrics provided, opportunity can be mapped by a third party statewide.

Explicit Definition of Opportunity: No explicit reference to opportunity

Implicit Definition of Opportunity:

VHDA includes an implicit reference to opportunity based on poverty rates.

Any proposed family development located in a census tract that has less than a 10% poverty rate (based upon Census Bureau data) (25 points). Effective January 1, 2018, any proposed family development located in a census tract that has less than a 12% poverty rate (based upon Census Bureau data) (20 points); any proposed family development located in a census tract that has less than a 3% poverty rate (based upon Census Bureau data) (30 points)

Mapping Feature: Poverty rates can be found using census data, therefore, opportunity is mappable statewide by a third party using metrics provided.

WASHINGTON STATE

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	Yes	•	•	•	•	•	Explicit	Opportunity is already mapped statewide

A legend for this table can be found on page 18.

The Washington State Housing Finance Commission’s (WSHFC) 2018 Qualified Allocation Plan (QAP) includes both an explicit and implicit preference for opportunity. Additionally, opportunity is already mapped statewide.

Explicit Definition of Opportunity:

Puget Sound Regional Council (PSRC) partnered with the Kirwan Institute for the Study of Race and Ethnicity in Ohio to develop the maps building off the Institute’s work on “Communities of Opportunity” across the country.

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 will be awarded 1 point. More information on Opportunity Mapping is available on PSRC’s website. If a project includes multiple sites, each of the sites must each be located within a High or Very High Opportunity Census Tract to be eligible for this point.

Five Major Indicators: Education, Economic Health, Housing, Transportation, Health and Environment

Implicit Definition of Opportunity:

WSHFC also offers points to projects that are either “Location Efficient”, have a “Transit Oriented Development”, or are located near “Job Centers”

Location Efficient Projects

Two points will be awarded to Urban Projects that are:

- 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. This does not count as one of the 3 or 5 facilities referenced in number 1 above.

Two points will be awarded to Rural Projects that are:

- located within a 2-mile driving distance of 4 or more facilities from the list below; AND
- one of the 4 facilities must be a supermarket, a grocery store with produce or a farmers' market supermarket, a grocery store with produce or a farmers' market.

WSHFC also lists several facilities that qualify under this category within its QAP, a few examples are: education, entertainment, pharmacies, and restaurants.

Transit Oriented Development

Projects will be awarded 1 point if they are located within a 10-minute walkshed of Fixed Transit Infrastructure and located in an area zoned for high-capacity transit-supported density. TOD points are only available to Projects in King County. Puget Sound Regional Council (PSRC) has generously developed a map to locate properties to fit the TOD definition outlined below. The map is available on our website. If a property meets the intent of the policy but fails to appear on the map, a location that meets the intent of the policy may still be eligible for the TOD point with preapproval.

Job Centers

One point will be awarded 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 period from 2005 to 2010. List is on page 76 of QAP.

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.

Mapping Feature: <https://www.psrc.org/opportunity-mapping>

WEST VIRGINIA

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	●	●	●		●	Explicit	Opportunity is mappable statewide by a third party using metrics provided

A legend for this table can be found on page 18.

The West Virginia Housing Development Fund’s (WVHDF) 2018 Qualified Allocation Plan (QAP) includes an explicit preference for opportunity. Additionally, opportunity is mappable statewide by a third party using metrics provided.

Explicit Definition of Opportunity:

High Opportunity Location

- Maximum points available:
 - 90 for New Supply
 - 45 for Preservation

- General Housing Stability – owner occupied units as a percentage of total occupied housing units
- General Housing Stability – 2010-2014 American Community Survey 5-year estimates. Percentage of households whose occupants per room are 1.01 or more for the state and census tracts
- Poverty/Public assistance – population below the poverty level as a percentage of the total population
- Poverty/Public assistance – households receiving food stamps as a percentage of total households
- Labor market engagement – unemployment rate of the total population 20 to 64 years of age
- Labor market engagement – population 25 years of age and older with an educational attainment of bachelor’s degree or higher as a percentage of the total population 25 years and older
- School Performance – WV’s school accountability system grade
- Proximity to Public Transportation

Implicit Definition of Opportunity:

While there are no other implicit incentives for opportunity, WVHDF does mention certain priorities that can be linked to opportunity. These include:

- General Housing Stability – owner occupied units as a percentage of total occupied units
 - % of units whose occupants per room are 1.01 or more
- Poverty/Public Assistance – population below the poverty level
 - Households receiving food stamps
- Labor market engagement – unemployment rate
 - Population 25 years of age and older with a bachelor’s degree
- School Performance
- Proximity to public transportation

Mapping Feature: Opportunity can be mapped using external data sources

WISCONSIN

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	•	•	•	•		Explicit	Opportunity is mappable statewide by a third party using metrics provided.

A legend for this table can be found on page 18.

The Wisconsin Housing and Economic Development Authority’s (WHEDA) 2018 Qualified Allocation Plan (QAP) includes an explicit preference for opportunity. Additionally, opportunity is mappable statewide by a third party using metrics provided.

Explicit Definition of Opportunity:

- Median Income Census Tract. Points will be awarded to properties in census tracts at/or above 120% of County Median Income and tracts between 100% and 119% of County Median Income
- Unemployment Rate in the census tract. Properties in census tracts below 70% of the national unemployment rate and tracts between 70% and 100% of national unemployment rate
- School District. Points will be awarded to properties in school districts in the top 25% of the Wisconsin department of public instructions most recent overall accountability score (5 points) and properties in school districts in the ranking in the second quartile (3 points)
- Location on Federally Designated Tribal Lands.
- Access to Amenities (Within 1 mile)
 - Full service Grocery Store
 - Public Elementary, Middle or High School
 - Senior Center
 - Full service Medical Clinic or Hospital
 - Library
 - Public Park
 - Job-Training Facility

Implicit Definition of Opportunity:

- N/A

Mapping Feature: Opportunity is mappable statewide by a third party using metrics provided

WYOMING

QAP Year	FHFA DTS Qualifying	Access to Education	Economic Growth/Jobs	Income Levels	Access to Health Care	Access to Transportation	Explicit or Implicit Definition of Opportunity	Mapping Feature
2018	No	o	o	o	o	o	Implicit	The current definition of opportunity does not provide sufficient metrics to be mapped statewide

A legend for this table can be found on page 18.

The Wyoming Community Development Authority’s (WCDA) 2018 Qualified Allocation Plan (QAP) includes an implicit preference for opportunity. Additionally, the current definition of opportunity does not provide sufficient metrics to be mapped statewide.

Explicit Definition of Opportunity: All mentions of opportunity or incentives of opportunity were considered implicit.

Implicit Definition of Opportunity:

WCDA includes an implicit preference for opportunity based on Project Location, which consists of: Appropriate Location, Concentration of Low-Income Housing, and Inappropriate Location.

1. A project may receive up to 35 points for being within a proximity of 2 miles of the below services

Distance from other locations			
	Points		Points
Employment opportunities	3	Elementary school	2
Fire	2	Junior or middle school	2
Police	2	High school	2
Proximity to public transit	3	College	1
Hospital	2	Convenience store	1
Senior center	3	Church	1
Bank	2	Post office	1
Doctor offices	2	Park	1
Laundry mat	3	Recreation	1
Grocery store	3	Library	1

Is there a grocery store that delivers?	1	Discount store	1
Pharmacy	2		
Is there a pharmacy that delivers?			

2. Concentration of Low-Income Housing (Maximum 15 points)
 - a. 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 study. WCDA will consider available data for comparable units in the area, such as visual observation, market study information, HUD Community Planning and Development maps
3. Inappropriate Location
 - a. Locations in 100-year flood areas, noise areas, areas of concentrated low-income, near hazardous sites, airport clear zones, sites listed in EPA CERCLIS data base

Mapping Feature: The current definition of opportunity does not provide sufficient metrics to be mapped statewide

References

ⁱ <https://www.huduser.gov/portal/datasets/lihtc.html>

ⁱⁱ This is born out in Harvard's equality of opportunity (Opportunity Insights) project here: http://www.equality-of-opportunity.org/assets/documents/movers_paper2.pdf

ⁱⁱⁱ https://mf.freddie.mac.com/docs/Affordable_Housing_in_High_Opportunity_Areas.pdf

^{iv} <https://www.fhfa.gov/PolicyProgramsResearch/Programs/Pages/Duty-to-Serve.aspx>

^v https://www.fhfa.gov/DataTools/Downloads/Documents/Enterprise-PUDB/DTS_Residential-Economic-Diversity-Areas/RED_HIGHOPP_Areas_READ%20ME_2017.pdf

^{vi} <https://www.fhfa.gov/PolicyProgramsResearch/Programs/Documents/Final-Evaluation-Guidance-DTS-Program.pdf>

^{vii} <https://catalog.data.gov/dataset/qualified-census-tracts>