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BUILDING A BETTER AFFORDABLE HOUSING FUTURE

How States Can Integrate Health, Energy Efficiency, Working Conditions, and Racial Equity in Their Qualified Allocation Plans



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ACKNOWLEDGEMENTS

The BlueGreen Alliance Foundation would like to thank partner organizations and steering committee members.

Thank you to colleagues Charlotte Brody, Yonas Haddis and Mikayla Brunner. Further appreciation to Dana Saylor, Roxanne Johnson, Harley Stokes, El'gin Avila, JB Tengco, Bree Halverson, Chris Markuson, Kelly Connolly, Jessica Eckdish, and Jason Walsh.

The BlueGreen Alliance Foundation would also like to thank Walker Wells (Raimi + Associates), Lauren Westmoreland (Stewards of Affordable Housing for the Future), and Pat Coleman (New Ecology) for their expertise and time.

The racial equity narrative was developed in collaboration with Miriam Zuk and staff at Ground Works Consulting. The section's criteria was designed with input and feedback from an advisory committee consisting of: Carlie Boos (Affordable Housing Alliance of Central Ohio), Don Gilmore (Community Housing Development Corporation), Dana Hanchin (HDC MidAtlantic), Megan John (Affordable Housing Tax Credit Coalition), Kara Mergl (Corporation for Supportive Housing), Chavelle Sangokoya (African American Alliance of CDFI CEOs), and Mark Shelbourne (Novogradac & Company LLC).

Errors remain the responsibility of the authors.

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Introduction

Each year, the Low Income Housing Tax Credit (LIHTC) (usually pronounced LIE-tek) funds the availability of more than 100,000 affordable housing rental units. LIHTC is the largest and most significant federal program for affordable rental homes and aims to alleviate the national shortage of rental housing that is affordable and available to the lowest income households. Many states are now providing important examples of how LIHTC can go beyond providing shelter to the nation's most vulnerable individuals and families. From New Jersey to Oregon, from Rhode Island to Colorado, states are demonstrating that the goals of affordability, health, racial equity, and highroad working conditions are not and must not be mutually exclusive.

The BlueGreen Alliance Foundation (BGAF) researched state Qualified Allocation Plans (QAPs) and developed this report to encourage states to learn from each other and improve efficiency, health, and equity in housing and create good jobs. Our findings show that while some states continue to make strides in considering energy efficiency and the health of occupants, others minimize their importance by not requiring LIHTC-financed properties to include these provisions or prioritize other housing needs. On racial equity, our research shows a majority of states address only a portion of areas that can reduce disparities and increase housing opportunities. Almost no states require or incentivize labor standards in their QAP and only encourage local sourcing or local-hiring provisions.

While all Americans deserve the same considerations when it comes to the benefits offered by QAPs, this report offers examples from forward-thinking states on how to better serve low-income families. The report also hopes

to raise the floor on baseline standards for health, energy efficiency, and equity provisions within state QAPs, encouraging states without these criteria in their QAP to rethink how to best maximize benefits of public dollars for residents hoping to receive these competitive tax credits. The importance of LIHTC in building new affordable rental units and preserving existing supply means that any modifications to the way these tax credits are allocated can have a significant impact on how low-income families live and benefits to surrounding communities. This authority to shape the QAP criteria for these tax credits gives states significant autonomy in determining how to best serve tenants and others impacted by the development and preservation of these projects. Because they hold the same weight as statutory language, QAPs are a highly valuable tool for advancing preferred policies. Using QAPs to improve efficiency, health, and equity in housing and create good jobs should be a goal for all states.

This report provides comprehensive research on how states are considering energy efficiency, health, and equity in affordable housing. By reviewing QAPs and QAP-adjacent documents (such as appendices, building and design standards, and green checklists) that detail priorities of state housing finance agencies, this report produces a scorecard on how each state meets specific criteria in three categories: healthy building practices; energy efficiency; and racial equity. Not included in the scoring portion—but equally important to affordable housing—are labor standards and local sourcing policies. The report reviews opportunities to increase standards that promote quality jobs and strengthen American manufacturing.

Scorecard Criteria

<p>Healthy Building Practices</p> <ul style="list-style-type: none"> • Green building certifications • Low Volatile Organic Compounds (VOC) paints/finishes/sealants • Healthy (Green Label) carpeting • Radon-resistant • Formaldehyde limits <ul style="list-style-type: none"> » Enhanced air quality » Ingredient material transparency » Banning two-part spray polyurethane foam 	<p>Racial Equity</p> <ul style="list-style-type: none"> • Access • Unit size • Depth of affordability • Outreach and affirmative marketing • Tenant screening • BIPOC developers and service providers • Community engagement • Supportive services • Location/siting • Location and environmental risk exposure • Location in high opportunity area/proximity to amenities • Data accountability and transparency
<p>Energy Efficiency</p> <ul style="list-style-type: none"> • ENERGY STAR certification • Green building certifications • Energy performance standards • Energy benchmarking • Water conservation 	<p>Labor Standards and Local Sourcing <i>(not graded in scorecard)</i></p> <ul style="list-style-type: none"> • Prevailing wages • Apprenticeship training • Buy Local • Hire Local

In *Showdown at Gucci Gulch*, authors Jeffrey Birnbaum and Alan Murray vividly describe how the legislative sausage that became the Tax Reform Act of 1986 was made. In one of the seminal moments of the book, then Senate Finance Committee Chairman Robert Packwood of Oregon and a staffer work out the framework for the comprehensive tax law over pitchers of beer at their favorite Capitol Hill saloon. This appears to be the origins for LIHTC. The little official legislative history we know of LIHTC is that it was not in the initial version of the tax bill, but was quietly added to little fanfare at a congressional committee markup.¹

Thirty-six years later, LIHTC stands as the federal government's largest and most significant initiative for developing affordable housing. Between 1987 and 2020, 50,567 projects and 3.44 million housing units have been

placed into service.² As this program continues to provide housing and preserve affordability for millions of Americans, it's worth considering how these buildings are being constructed or preserved, and the impact they can have on the health and well-being of residents and workers.

There continues to be a significant need to develop and preserve rental homes for low-income families. The National Low-Income Housing Coalition reported a national shortage of 7 million affordable and available rental homes for extremely low-income (ELI) households, and there are just 36 such "affordable and available" homes for every 100 ELI renter household nationwide.³ And while it's vital to address the nation's growing need for affordable housing, attention is also needed to ensure that the health of current workers and future tenants is considered in the development and preservation of these buildings.

	Healthy Building Practices	Energy Efficiency	Racial Equity	Overall Grade		Healthy Building Practices	Energy Efficiency	Racial Equity	Overall Grade
AK*	F	D	D	D	MT*	F	F	D	F
AL	D	F	D	D	NC*	F	C	F	D
AR	F	F	C	D	ND*	C	D	C	C-
AZ	C	B	F	C-	NE*	F	F	C	D
CA	F	D	D	D	NH*	B	B	D	C+
CO*	A	A	C	B+	NJ*	C	A	C	B-
CT*	B	B	C	B-	NM*	D	C	D	D+
DC*	A	A	B	A-	NV	C	D	D	D+
DE*	B	B	B	B	NY	A	A	F	B-
FL	C	C	C	C	NYC	A	A	F	B-
GA	A	B	C	B	OH*	A	A	B	A-
HI	C	B	F	C-	OK	F	D	D	D
IA	B	C	D	C	OR*	A	B	B	B+
ID	A	B	D	B-	PA	C	B	D	C
IL*	A	A	B	A-	RI*	C	A	B	B
Chi, IL	F	F	C	D	SC	D	C	D	D+
IN*	C	D	B	C	SD	D	B	D	C-
KS*	F	F	B	D	TN*	F	F	F	F
KY	F	F	F	F	TX*	C	D	D	D+
LA	B	B	D	C+	UT	C	B	D	C
MA*	A	C	D	C+	VA*	C	B	D	C
MD*	B	B	B	B	VT*	A	B	D	B-
ME	D	F	F	F	WA*	A	B	B	B+
MI*	A	B	B	B+	WI	A	B	D	B-
MN*	A	A	B	A-	WV*	F	F	D	F
MO	C	C	D	C-	WY	F	C	D	D
MS	B	D	F	D+					

* These states responded to outreach and provided feedback on BGAF research of the state's QAP.

What are Low Income Housing Tax Credits?

LIHTC supports the development and rehabilitation of affordable rental housing by encouraging private investment in its production and preservation. The LIHTC program does not provide housing subsidies, but rather provides tax incentives—or credits—written into the Internal Revenue Code to encourage developers to create or rehabilitate affordable housing. These credits are awarded to developers to help offset the cost of constructing or preserving rental housing in exchange for reserving rent-restricted units for lower-income households. States receive annual LIHTC allocations in accordance with federal law and then distribute tax credits to developers according to federally-required QAPs that are created and administered by state housing finance agencies (HFAs).

To be eligible, a development must meet one of three criteria on the income of eligible tenants. This income test for LIHTC requires project owners to have 20% of units at 50% of the area median income (AMI), 50% of units at 60% AMI, or an income averaging option that is met if 40% of the units are occupied by tenants with an average income no greater than 60% of AMI, and no individual tenant exceeding 80% of AMI.

There are two types of tax credit rates in the LIHTC program, 9% and 4%. The 4% credit—typically awarded alongside private activity bonds—is more widely available than its 9% counterpart and is not typically subject to a competitive scoring process within a QAP. The 9% credit is limited and based on a per capita formula and subject to a competitive allocation process. This report will primarily focus on these tax credits.

The demand for 9% tax credits outpace supply in many states, thus applicants try to maximize their chances of being awarded funding by closely adhering to the requirements and point structure within a state's QAP. They are particularly popular as they give multifamily property owners a dollar-for-dollar reduction in federal taxes, which are sold to banks and other financial institutions to assist in a project's funding. Because the credit lowers debt needed to develop a housing project, rent levels are lower and more affordable to lower-income families.



What are Qualified Allocation Plans?

Each state develops a QAP to serve as a guideline and establish priorities for the allocation of 9% tax credits.⁴ QAPs can incentivize developments for siting projects in desirable locations, offering extra amenities for disabled tenants, allowing future opportunities for homeownership, and meeting resiliency and sustainability standards, for example. There are few regulations or federal guidance on what to include within a QAP and minimal parameters beyond a preference for applicants that serve the lowest-income tenants for the longest period of time.

States have broad discretion in administering QAPs and determining the importance of criteria within the document. States structure QAPs around several categories:

- eligibility requirements;
- points via a state-designed scoring system;
- credit set-asides; and
- basis points.

In addition, housing priorities in rural states or less dense areas can be different than urban, highly populated states. This system is designed based on the concept that states are best equipped to determine the local and regional housing needs and priorities.

The annual process for allocating tax credits is less convoluted than the complexity of designing and drafting a QAP. Each year or two a state will revise their QAP—typically through their housing finance agency—and offer an opportunity for public comments, with the finalized draft then approved by the agency's board and signed by the governor. Affordable housing developers will then apply for the tax credits, and the state agency will review and award the credits to applicants that meet the QAPs threshold requirements and/or achieve the highest scores based upon the state's criteria. Then, the process begins again.

Most states use threshold requirements and incentives to aid the allocation process and differentiate applicants. Threshold requirements are mandated minimum standards that need to be met to qualify for tax credits. They also offer insight on the priorities of a state and its local housing needs. Incentives, on the other hand, are often associated with a QAP's scoring criteria.

In the state of Nevada, for example, there are 19 threshold requirements for competitive projects within their QAP, ranging from:

- completing a market study on income;
- unit sizes and rents;
- providing written documentation showing the developer legally owns the site for proposed development;
- verifying the applicants have low-income housing experience; and
- ensuring projects have infrastructure for internet connection in all units.⁵

Nevada's QAP has a scoring system totaling 124 points, and all applicants must at least earn 60% of available points to be eligible to receive tax credits. Points are awarded for the application having the highest unit square footage for units with children or large families; using fiberglass/cellulose or foam wall insulation; and the site location being in close proximity to schools, grocery stores, and community centers. The Nevada Housing Division—the state agency which oversees the QAP—will then rank each application to determine who is awarded with the federal tax credits.

“QAPs serve as a valuable tool to advance progressive solutions in affordable housing.”

QAPs serve as a valuable tool to advance progressive solutions in affordable housing. It's important to think of QAPs as essentially a state statute. “The QAP is basically a law,” notes expert Mark Shelburne.⁶ As they are modified on an annual or biennial basis,

they offer a unique opportunity to make concrete changes to better serve tenants. However, they are technical documents, often with scoring systems written for and constructed to benefit developers and property managers. The community engagement process varies state-to-state, and clear, consistent guidance is often not provided. Current and future tenants of subsidized affordable housing are rarely at the table with the housing professionals, architects, and advocacy organizations that review QAP criteria. States will typically offer interested stakeholders several paths to provide comments, but these official periods to offer input are typically a formality, as HFAs will often accept comments throughout the year.

Purpose of the Scorecard

BGAF undertook this project to encourage states to improve efficiency, health, and equity in housing and create good jobs. To achieve this, the report focuses on what we believe should be three pillars of QAPs: healthy building practices, energy efficiency, and racial equity.

The goal of this report was to collect all appropriate data; develop scoring criteria to properly evaluate how states prioritize these topics within their QAPs; and highlight innovative practices in a handful of states that can possibly be incorporated elsewhere. BGAF staff reviewed the QAPs and QAP-related documents in all 50 states and Washington, D.C. up until November 2022. BGAF staff also reviewed the QAPs from Chicago, IL, and New York, NY, who both receive their own tax credits and produce QAPs independent of their states. This research was compiled and shared with state housing finance agencies to ensure accuracy.⁷

This research aided in the development of scoring criteria to evaluate how states prioritize health, energy efficiency, and equity within their QAPs. While the methodology is somewhat subjective in nature, it focuses on the core areas within each category and was shared and analyzed by BGAF staff and external experts. Labor standards and local sourcing were also reviewed. Unfortunately, these areas are often ignored within QAPs, and thus the decision was made not to include them in the scoring portion of the scorecard. Their omission should not be viewed as a diminishment compared to the other three sections.

1

Healthy Building Practices

The products and materials we choose to build our homes can impact the environment, our health, the economy, and our communities. Many chemicals used in building products that make up our indoor spaces are known or suspected to have short-term effects or cause long-term health conditions. The risk of developing health problems from a chemical exposure will depend on the type of chemical and its toxicity—the amount of a chemical a person has been exposed to, the length of time a person has been exposed, and the amount of times the person was exposed. Installers who work frequently with a similar group of products with known health risks, and occupants who spend a large percentage of time in their home, are at a greater risk of exposure to chemicals that may be present in certain building products.

2

Energy Efficiency

Energy efficiency in buildings provides several benefits to owners and occupants, and is a matter of health and equity as much as it is a matter of resource saving. Investing in a building's improved energy efficiency through air sealing and insulation lowers energy bills, increases a building's durability, and creates a healthier indoor environment by optimizing humidity and temperature levels. This is key in addressing climate change, particularly through increasing the energy efficiency of new and existing buildings in commercial and residential sectors.

3

Racial Equity

Racial equity and affordable housing are inextricably linked. A majority of low-income renters are people of color and an estimated 30 million affordable housing units are considered substandard because of physical and health hazards. Criteria within QAPs can include measures to help alleviate racial disparities by prioritizing improvements in the lives of people of color and centering the voices of marginalized groups in decision-making.

Areas of Improvement for State QAPs

As previously mentioned, there is a wide spectrum of issues states can and do target within their QAPs. Given this broad authority to prioritize certain aspects of affordable housing, state HFAs overlook several provisions that would better serve future tenants and the surrounding community.

For example, no state QAP explicitly encourages certifications or labels that limit or are free of the most hazardous chemical content, such as Cradle to Cradle and the Living Building Challenge Red List Free.⁹ These disclosures aid in the development of sustainable building products that lead to healthier buildings and indoor environments. Enterprise Green Communities does incentivize Ingredient Transparency for Material Health in their Materials section, offering four compliance options that would allow project decision-makers to make more informed choices through public ingredient disclosure for building products.¹⁰ States should consider including QAP criteria that provides full disclosure of material content and avoids exposure to hazardous chemicals for the people who build and reside in low-income housing.

Labor standards and local sourcing are often overlooked in state QAPs, which do not typically provide incentives for policies that promote hiring local residents and using American-made products, nor do they generally support fair labor practices. As a result, affordable housing development and rehabilitation projects may not necessarily lead to the creation of high-quality jobs, which are essential for building a cleaner, safer, and more equitable workforce. In addition, a lack of focus on these standards can hinder efforts to diversify local and regional economies, as well as create and sustain quality economic opportunities.

Therefore, incorporating labor standards and local sourcing into state QAPs can help promote the hiring of local residents, use of American-made products, and fair labor practices, which can ultimately lead to the creation of high-quality jobs. This can also help diversify local and regional economies, as well as create and sustain quality economic opportunities.

Findings

Overall, states have continued their trajectory to integrate health and energy efficiency into their QAPs, but have considerable work to do to address racial disparities and create a more equitable workforce. Much of the success from states with high scores is achieved through the inclusion of green building certifications, an area states have increased in utilization in recent years. Since BGAF's previous research in 2020, more states include green building certifications, and perhaps more importantly, more states require this third-party certification.⁸

Combining the scores of all states, the national average grades out at a "C." However, if labor standards and local sourcing are included in the scoring—an area largely ignored by states in their QAPs—the score would be lowered to a "D."

States continue to primarily rely on green building certifications to encourage affordable housing developers to use healthier building materials and consider the health of tenants in the development and preservation of housing projects. The use of either low-VOC finishes/flooring or low-VOC paints/sealants is required in 20 states for new construction and in 15 states for moderate rehabilitation projects, far more than any other healthy building metric.

Conversely, much work needs to be done by states to confront existing systemic barriers that create inequalities for communities of color. Even with a lenient curve, no state achieved a score high enough to receive an "A" grade. While states scored well in incentivizing amenities like childcare or health services and developing multifamily properties in high-resource areas with schools and job opportunities, a majority of states do not address issues such as tenant screening, community engagement, and data accountability and transparency of tenant demographics.

Overall, the District of Columbia, Illinois, Ohio, Oregon, and Washington had the highest cumulative scores, with the first three being the only states/territories to achieve an "A-." Illinois achieved the highest overall score, as their HFA requires all projects to adhere to mandatory criteria of Enterprise Green Communities and includes provisions aimed at unit design, affirmative marketing, and significant incentives for minority and women-owned developers.

1

Healthy Building Practices

**“Not mentioned...
is the health of
occupants or workers
assisting in a project’s
development.”**

In one of the few examples of federal guidance on QAPs, the Internal Revenue Code includes ten criteria for state QAPs.¹¹ Among the criteria that must be included are project location, housing needs characteristics, whether a project will be part of a community revitalization plan, and the energy efficiency of the project. Not mentioned—or alluded

to—in the list is the health of occupants or workers assisting in a project’s development.

Despite this lack of guidance, state HFAs have utilized QAPs to signal that the health of individuals constructing and living in these buildings is important. Housing developments that prohibit or limit the use

of harmful materials safeguard construction workers and residents from exposure to toxic chemicals that can have severe and long-term consequences. Building materials—including insulation, paints, and sealants—can lead to health conditions such as respiratory illness, asthma, lead poisoning, and cancer.¹²

Why Healthy-Building Practices Matter

As the LIHTC program is the nation’s largest initiative to incentivize affordable housing production, QAPs are a powerful lever states can use to signal their desire in prioritizing healthy indoor environments. Health and housing are inextricably linked, and encouraging developers to use building products that minimize exposure of harmful chemicals is beneficial to both installers and occupants. It’s important to highlight this connection, as it may not always be prioritized by decision-makers at the state level. A survey with responses from HFAs completed by the University of Florida and University of Illinois found that only a third of states considered a sufficient level of healthy housing provisions when choosing a green building certification to include in their QAPs.¹³

Buildings that are built with products containing hazardous chemicals can create an unsafe environment for residents. Almost 40% of residences have at least one health or safety hazard, costing the United States billions annually in treatments for asthma, injuries, lung cancer, and other health problems.¹⁴ Many chemicals in building products do not remain in the product. Instead, chemicals migrate out of building products into the air and dust of indoor environments; construction processes and degradation of products can also contribute to indoor contamination.

These chemicals enter our bodies through breathing (inhalation), our mouths (ingestion), and our skin (absorption), and can result in adverse health problems both short- and long-term. Acute symptoms from chemical exposures can include headaches, dizziness, rashes, and eye irritation. More severe acute symptoms can include chemical burns, allergic reactions, or the triggering of an asthma attack.

Long-term health conditions can develop over time from exposure to one or more hazardous chemicals. In these cases, chemicals cause damage to a person's organs or internal systems, which can result in conditions and diseases that include cancer, asthma, sexual and reproductive health issues, hypertension, reduced I.Q., obesity, birth defects, and other adverse birth outcomes.

There are usually alternative, healthier building products available domestically. Buying building products made in the United States helps create jobs and supports communities. Building Clean's Manufacturing Efficiency report shows that combining investments in efficiency with incentives that prioritize U.S.-made products will create more than 170,000 additional manufacturing jobs.¹⁵ Selecting products made in the United States can also help meet local sourcing incentives and requirements for various green building certifications.

In addition, inequities in housing have exacerbated health disparities. Due to systemic racism, people of color and individuals with lower incomes are more likely to suffer illnesses from chemical exposures.¹⁶ State policymakers and affordable housing developers can help mitigate these disparities by addressing health concerns in the built environment that harm certain populations in vulnerable communities. With these health concerns in mind, it's imperative that LIHTC—the nation's largest source of funding for development and preservation of affordable rental housing—helps shape a healthier affordable housing stock to the benefit of workers and tenants.



Methodology

Comparing each state based on how they seek to improve residents' health or address adverse health impacts within their QAP is challenging. Just as states use different mechanisms and priorities to reward developers with federal tax credits, there are several ways to signify the importance of health measures. The most notable is whether states require or incentivize green building certifications.

A focus on sustainable building design in the 1990s created a market for rating systems that certify buildings based on environmental performance, energy efficiency, resiliency, and holistic health implications. The Building Research Establishment's Environmental Assessment Method (BREEAM) was the first green building rating system. Since then, the number of certification programs has considerably expanded with Leadership in Energy and Environmental Design (LEED), Enterprise Green Communities, and the National Green Building Standard (NGBS) the most prevalent in QAPs. These certifications are a way for HFAs to add sustainability criteria to their QAPs that includes options that contribute to a healthier environment and reduce exposure to harmful chemicals. For both new construction and rehabilitation scoring, requiring a green building certification granted full credit for that healthy building practices sub-section.

To be sure, green building certifications serve different purposes and have varied objectives. The WELL Building Certification takes a holistic approach where the built environment can enhance the user's physical, mental, and emotional well-being. The Living Building Challenge, meanwhile, requires buildings to be net positive in energy and water and values a site's materials, health, equity, and beauty. There are also differences in certification costs, points that can be achieved, on-site documentation, and ongoing evaluations.

What is clear is most—but not all—green building certifications referred to in QAPs share similar criteria that seek to reduce exposures to environmental hazards.¹⁷ In particular, the three most commonly used certifications in QAPs—LEED, Enterprise Green Communities, and NGBS—are aligned in most of the criteria of the core scoring segment of the healthy building practices section (low VOC finishes/flooring/paints, ventilation, materials that limit or ban the use of formaldehyde, radon-resistant, and healthy carpeting).

Several states require a development to meet specific criteria within a green building standard, but don't require the project to be certified. For such instances, the scorecard's methodology grants points as if it were certified. A prime example can be found in Illinois. Its QAP requires projects to adhere "to the 2020 Enterprise Green Communities 40 mandatory project criteria in the eight major sections of the Enterprise program."¹⁸ Two of these eight major sections, 'Materials' and 'Healthy Living Environment,' include valued healthy building practices such as low-VOC content in all interior paints, coatings, adhesives, and sealants; radon mitigation; and ventilation requirements in accordance with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE 62.2-2010).

For those states that don't mandate or require green building standards and instead offer developers a menu of health-related criteria, the scoring model gives points for specific healthy building practices. Maine's QAP, for example, urges low-VOC paint, adhesives, and sealants in all occupied spaces, and requires ventilation that is compliant with ASHRAE standards and Green Label carpeting in lieu of green building certification.

In addition to the new construction and rehabilitation sub-sections, the scoring model extends a bonus point for banning the use of two-part spray polyurethane as it contains isocyanate chemicals and is linked to respiratory diseases.¹⁹ According to the National Institute for Occupational Safety and Health, isocyanates are powerful respiratory irritants and sensitizer chemicals that can cause chronic, debilitating respiratory diseases including asthma—with deaths reported in workers after severe asthma attacks. Banning or limiting two-part spray polyurethane is not a criterion in a majority of green building certifications.

State Examples

Michigan

Michigan's QAP notes the need to include healthy, green, and sustainable building practices for "safe, decent, affordable housing."²⁰ To this end, the Michigan State Housing Development Authority requires all projects—new construction, moderate rehabilitation, and substantial rehabilitation—applying for and receiving tax credits to incorporate either Enterprise Green Communities, NGBS, or USGBC LEED. Additional points are available for applicants selecting Enterprise Green Communities Plus, NGBS Green+ Zero Energy, LEED Zero Energy, or PHIUS+.

Idaho

While Idaho only incentivizes green building standards, it combines this option with requirements for a majority of the scorecard's healthy building practices criteria.²¹ The Idaho Housing and Finance Association—the state's allocating agency—offers LIHTC applicants eight points for incorporating a "green building certifiable program standard" into their design. Idaho's QAP grants tax credits to developments receiving the highest number of points. Options for green building certifications include LEED, NW Energy Star, NGBS, Enterprise Green Communities, Indoor Air Plus, and Passive House Institute. This incentive is the same for both new construction and rehabilitation projects. The alternative option to receive green buildings points is through individual green buildings components, where options include cabinets without added urea-formaldehyde and Green Label certified low-emission carpet/pad/adhesive.

In addition, all developments are required to meet ASHRAE 90.1 standard for multifamily buildings and use low- or no-VOC paints, primers, adhesives, and sealants. This prescriptive strategy earned Idaho one of the highest scores in the section.

Findings

Green building certifications continue to be a driving force in many QAPs to comprehensively address the impact of buildings on the surrounding environment. According to past research by Global Green, third-party green building certifications were referenced in 32 states in 2017, rising from being mentioned in 16 states in 2010.²² Our research indicates 35 state QAPs now either require or incentivize green building certifications for new construction projects. Perhaps more noteworthy is that Global Green's 2017 data indicated that only eight states required a third party green building certification, a threshold that BGAF found to increase to 16 states.

The states and cities with the highest scores were those who mandated green building certifications for both new construction and rehabilitation projects. Colorado, Washington, D.C., Georgia, Michigan, Minnesota, New York City, Ohio, Oregon, Washington, and Wisconsin all received high scores for including this requirement for all competitive projects. A state with a unique path to one of the top point totals in the scorecard is Idaho, which requires developments to meet several individual healthy building standards while incentivizing a third-party green building certification.

The criteria the most states met is the use of no- or low-VOC products, where 24 states have language encouraging this provision for new construction projects. Most commonly cited in states are low-VOC paint and sealants, typically abiding by standards from the South Coast Air Quality Management District—an air quality agency for Orange County, California, that serves as a blueprint for clean air standards.

Not as prevalent in QAPs, but equally important for the health of residents, is limiting products that contain harmful chemicals like formaldehyde. The colorless carcinogen is often included in binders for fiberglass insulation and composite wood products. Mississippi and South Dakota require the use of formaldehyde-free insulation, while Illinois and New York require fiberglass or mineral wool batt insulation to be formaldehyde-free. Overall, eight state QAPs offer specific provisions limiting or banning formaldehyde in certain building products.

Healthy Building Practices Criteria

Third-party green building standards: Certification systems typically established by independent third parties to evaluate the sustainability and environmental impact. These include Leadership in Energy and Environmental Design (LEED), Enterprise Green Communities (EGC), and the National Green Building Standard (NGBS).

Low-VOC finishes, flooring, paints, sealants, and adhesives:

- Flooring and flooring finishing products that have no- or low-VOC content and/or emissions. May include third party certifications such as FloorScore, GREENGUARD Gold, and Indoor Advantage.
- Paint, sealant, and adhesive products that have no- or low-VOC content and/or emissions. Low-VOC content is commonly based on the South Coast Air Quality Management District's (SCAQMD) VOC content standard. May include third party certifications such as Green Seal, GREENGUARD Gold, and Indoor Advantage.

Ventilation targets: Promote indoor air quality and ventilation by meeting ASHRAE ventilation standards and/or the installation of exhaust fans.

Radon-Resistant: Measures that reduce occupants' exposure to radon gas.

Use of products that ban or limit the use of formaldehyde:

Low-formaldehyde emission limits on certain types of products. Examples include use of formaldehyde-free insulation and sealed board products such as shelving, cabinets, and countertops.

Healthy (Green Label) carpeting: Carpet, cushion, and adhesive products that meet the low-VOC emissions standard set by the Carpet and Rug Institute.

Insulation: Provisions that call for fiberglass insulation products that are third party certified to have low-VOC emissions by GREENGUARD, and/or banning the use of two-part spray polyurethane foam.

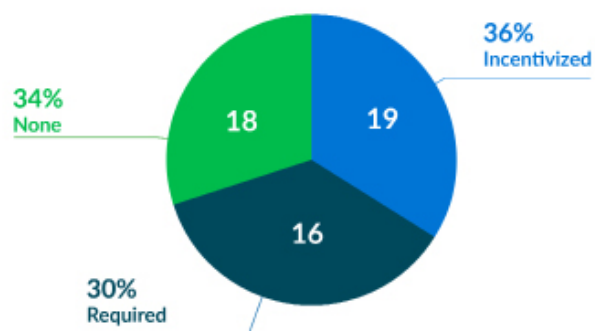
Healthy Building Practices Criteria

New Construction	Mandated—10 pts Incentivized—5 pts	Green building certification	
	Mandated—2 pts Incentivized—1 pt	Low-VOC finishes/ flooring/painting	
		Ventilation (ASHRAE)	
		Formaldehyde-free	
		Radon-resistant	
		Healthy carpeting (Green Label)	
		Total	out of 10
Moderate Rehabilitation	Mandated—10 pts Incentivized—5 pts	Green building certification	
	Mandated—2 pts Incentivized—1 pt	Low-VOC finishes/ flooring/painting	
		Ventilation (ASHRAE)	
		Formaldehyde-free	
		Radon-resistant	
		Healthy carpeting (Green Label)	
		Total	out of 10
	Bonus point - Insulation (GREENGUARD; ban spray foam)		
		20	

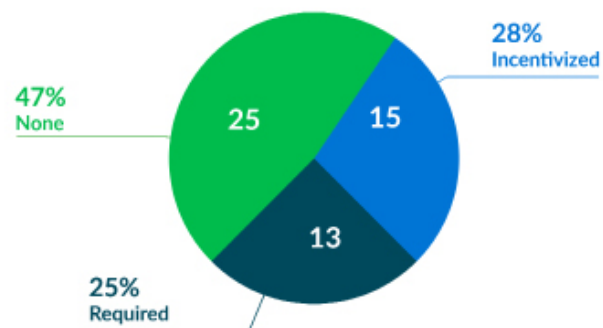
Healthy Building Practices Scorecard

STATE					
AK	F	KY	F	NYC	A
AL	D	LA	B	OH	A
AR	F	MA	B	OK	A
AZ	C	MD	B	OR	A
CA	F	ME	D	PA	C
CO	A	MI	A	RI	C
CT	B	MN	A	SC	D
DC	A	MO	C	SD	D
DE	B	MS	B	TN	F
FL	C	MT	F	TX	C
GA	A	NC	F	UT	C
HI	C	ND	C	VA	C
IA	B	NE	F	VT	A
ID	A	NH	B	WA	A
IL	A	NJ	C	WI	A
Chicago	F	NM	D	WV	F
IN	C	NV	C	WY	F
KS	F	NY	A		

Green Building Certifications–New Construction



Green Building Certifications–Moderate Rehabilitation



Green Building Certifications Referenced in QAPs

EGC	32
LEED	28
NGBS	25
Passive House	10
EarthCraft	5
Living Building Challenge	3
Green Globes	2

2

Energy Efficiency

The benefits of energy efficiency in affordable housing are numerous. Upgrades can increase multifamily development's net operating income, improve environmental outcomes, and allow households to save on energy bills. Making LIHTC properties more energy-efficient is a cost-effective way to decrease energy consumption, reduce pollution, and create healthier and more comfortable environments for tenants, all while maintaining housing affordability.

Why Energy Efficiency Matters

Lowering energy usage is critical to maintaining affordable housing. The cost of energy is one of the largest operating expenses in affordable multifamily housing.²³ In an ideal world the lowered operating costs from improved efficiency at a LIHTC property transfers to maintenance, repairs, and other resident-friendly improvements. Because low-income households are more likely to live in less-efficient housing, they are also burdened with high energy costs and a higher percentage of their income goes towards energy bills, compared to higher income households.²⁴ These households also tend to have higher energy burdens due to older appliances and household equipment that causes higher energy usage and costs. Researchers with ACEEE reported the energy burden for median low-income multifamily households was more than twice as high as other multifamily households.²⁵ Furthermore, Black and Hispanic households were found to spend a greater proportion of their income on utilities than the average family, with the median energy burden of Black households 43% higher than white (non-Hispanic) households.

Often overlooked is the impact energy efficiency can have in providing a healthier indoor environment. Making LIHTC properties more energy efficient can reduce pollution and create not only healthier but also more comfortable living environments for residents. Improving energy efficiency through air sealing and insulation—for example—creates a healthier indoor environment by optimizing humidity and temperature levels, improving air circulation, and avoiding the build-up of harmful chemicals and allergens. An airtight house combined with proper ventilation improves indoor air quality by reducing contaminants like dust, mold, and outdoor pollution.

Energy-inefficient housing can increase residents' risk for developing serious health problems, such as respiratory symptoms, asthma, cancer, and cardiovascular disease.²⁶ Improving energy efficiency in LIHTC properties can significantly improve indoor air quality and produce positive impacts on residents' financial security, health, and well-being.

According to the U.S. Environmental Protection Agency (EPA), in 2021 an estimated 13% of U.S. greenhouse gas emissions came from residential and commercial direct emissions.²⁷ Improving energy efficiency in affordable housing can help reduce emissions of greenhouse gas emissions by reducing consumption of fossil fuel-based energy. For example, an ENERGY STAR certified new home can help achieve greenhouse gas emissions reductions, as the program's reduction of emissions were equivalent to more than 5% of the United States's total greenhouse gas emissions.²⁸

Methodology

There are many ways states address energy efficiency within their state plans, often times focusing on state priorities depending on geographic preferences and regional climate needs. This report determined the fairest way to evaluate energy efficiency measures within QAPs is to focus on outcomes. To do this, the scorecard places a greater emphasis on performance-based testing and the use of third party certification.

There are other criteria that are extremely critical in lowering energy usage and assuring long-term operating sustainability. These include, but are not limited to renewable energy incentives, green physical needs assessments of a property, utility allowances, and coordination between state HFAs and state utilities on the design and implementation of energy efficiency programs. While many of these are worthwhile incentives for HFAs to include in their QAP to target efficiency and conservation initiatives, they address processes of lowering energy usage as opposed to delivering outcomes and are thus not part of the scoring methodology for this report.

Performance incentives mandate project owners to establish what the proposed energy consumption is of a development before construction or rehabilitation, and then implement energy reduction measures to achieve the desired energy consumption percent reduction. One of the more common energy efficiency home measurements is the RESNET Home Energy Rating System (HERS) Index. This standard performs an energy analysis that informs the owner how their property compares with similar properties in terms of energy usage. The HERS Index uses a baseline score of 100, and the lower the score the more energy-efficient the property is.

There are other paths to address energy efficiency, and also multiple ways to reach similar outcomes. A building performance model is needed to achieve an ENERGY STAR certification, with either a HERS Index or energy savings through ASHRAE used depending on the type of residential development being built. In addition, many green building certifications—such as Enterprise Green Communities and LEED—include mandates or incentives to be ENERGY STAR certified or reach specific energy reduction thresholds.



State Examples

Connecticut

The Connecticut Housing Finance Agency prides itself on its dedication to bettering the environmental impact of affordable housing construction in its QAP.²⁹ The most recent plan has energy efficiency and green building criteria making up 13% of all possible points.³⁰ Along with incentivizing green building certifications such as Enterprise Green Communities, NGBS, LEED, and the Living Building Challenge, Connecticut's QAP offers tiered points for energy conservation measures. For new construction, two, three, and four points are awarded for an average HERS index below 50, 46, and 42, respectively. For sustainable design measures for the state's preservation projects—which include rehabilitation projects—applicants are required to meet an average HERS index of 70 or less or have a 30% reduction in pre-rehabilitation energy use.

Minnesota

Minnesota is unique in how it addresses sustainable, energy efficiency, and healthy housing.³¹ All development must comply with Minnesota's Overlay to the Enterprise Green Communities criteria.³² This standard essentially aligns with Enterprise, but includes criteria targeted to Minnesota and doesn't require projects to be certified from Enterprise Green Communities. Besides a handful of exceptions, ENERGY STAR certification is required within this state standard and energy reduction measures must be met. All developments are required to meet one of two pathways of compliance for water conservation: a performance pathway achieving a 20% reduction in water usage, or a prescriptive pathway with specific targets for toilets, showerheads, and kitchen and lavatory faucets.

Energy Efficiency Provisions in Green Building Certifications	
2020 Enterprise Green Communities	LEED v4.1 Residential BD+C
<u>New Construction</u> <ul style="list-style-type: none"> All buildings with residential units must have the appropriate ENERGY STAR certification Points offered for certifying project through a zero energy program (ex: DOE ZERH, PHIUS+, ILFI Living Building Certification) 	LEED offers several pathways to achieve the required minimum level of energy efficiency in residential multifamily buildings. Options include energy performance compliance, prescriptive compliance, or a dwelling unit energy simulation. The first two options revolve around compliance with ASHRAE 90.1-2016, while the latter must meet or exceed the ENERGY STAR v3 HERS Index Target.
<u>Rehabilitation</u> <ul style="list-style-type: none"> Mandates a building performance standard, with either ERI or ASHRAE thresholds met for energy performance. Additional points are offered for additional reductions in energy use. 	

Findings

Roughly a third of states require or incentivize projects to meet the criteria or achieve certification through green building standards—a majority of which include energy efficiency measures. As mentioned, the more prominent green building certifications are both third party verified and target ENERGY STAR certifications and building performance standards.

Some states incorporate green building standards to specifically address energy efficiency. Indiana lists the minimum standards in LEED, 2020 Enterprise Green Communities, and the National Green Building Standard as design requirements for energy efficiency. Illinois requires all projects to adhere to criteria in the eight major sections of the 2020 Enterprise Green Communities program, with the “Operating Energy” section including energy performance and energy efficient appliances.

The Washington, D.C. QAP offers a noteworthy example of delineating energy efficiency policies between new construction and rehabilitation projects. New construction projects must be certified at the 2020 Enterprise Green Communities Plus level or pursue a “substantially similar standard” and receive a waiver from an oversight agency.³³ Rehabilitation projects must use base-level 2020 Enterprise Green Communities criteria—or be approved for a similar

standard—and meet criteria within the district’s Building Energy Performance Standards.³⁴ The coordination between the D.C. HFA and building energy code highlights a unique manner to address and target the area’s energy efficiency priorities.

Delaware offers flexibility between green building performance and energy conservation. Up to eight points are offered for all LIHTC projects on a menu containing green building certifications (2020 Enterprise Green Communities, the National Green Building Standard, and LEED) and a HERS index rating of 75 or less, the latter of which is only offered for rehabilitation projects.

Eighteen states require or incentivize new construction properties to improve energy performance through an ENERGY STAR certification. ENERGY STAR is less likely to be utilized for moderate rehabilitation projects, although this option is used as an incentive in a handful of states, while others offer a qualification if the standard can’t be met due to associated costs. North Carolina, for example, states an ENERGY STAR certification must comply “to the extent doing so is economically feasible” for rehabilitation projects. Utah offers a similar caveat, as rehabilitation projects must be ENERGY STAR “enhanced” if a certification cannot feasibly be achieved.

New Construction					
ENERGY STAR		Green Building Certifications		Energy Reduction Measures	
Required	Incentivized	Required	Incentivized	Required	Incentivized
13	6	16	19	2	10

Rehabilitation					
ENERGY STAR		Green Building Certifications		Energy Reduction Measures	
Required	Incentivized	Required	Incentivized	Required	Incentivized
5	4	13	15	9	7

Energy Efficiency Criteria

ENERGY STAR certified: An EPA/U.S. Department of Energy (DOE) program with strict efficiency requirements that are independently verified to be energy-efficient and durable.

Net zero policy/certification: A plan—either a documented policy or incentivized through a third party building certification—for a residential development to produce as much energy on an annual basis as it consumes. Examples include DOE Zero Energy Ready, 2020 Enterprise Green Communities Plus, Passive House (Plus), International Living Future Institute's (ILFI) Zero Energy Certification, etc.

Third-party green building standards: Certification systems typically established by independent third parties to evaluate sustainability and environmental impact. These include LEED, 2020 Enterprise Green Communities, and the National Green Building Standard.

Performance-based energy reduction initiatives: Reduce energy consumption at a development by a certain percentage or rating based on a recognized standard or a pre-retrofit baseline.

- Example: HERS rating below 62 or exceed ASHRAE 90.1-2010 by 25% (Iowa)
- Example: 20% or greater over pre-retrofit levels or measures that have a Savings to Investment Ratio of 2.0 or greater (Georgia)

Water conservation efforts: Provisions encouraging the installation of low-flow plumbing fixtures—including faucets, showerheads, and toilets—to deter excessive water consumption. Often affiliated with the WaterSense program/products.

Energy benchmarking: Tracks energy consumption of a project and comparing it to similar properties/buildings.

Energy Efficiency Criteria

New Construction			Moderate Rehabilitation			Other Provisions		
ENERGY STAR certification	Mandated 8 pts		ENERGY STAR certification	Mandated 8 pts		Benchmarking	Mandated 2 pts	
	Incentivized 4 pts			Incentivized 4 pts			Incentivized 1 pts	
Green Building Certification	Mandated 8 pts		Green Building Certification	Mandated 8 pts		Water Conservation	Mandated 2 pts	
	Incentivized 4 pts			Incentivized 4 pts			Incentivized 1 pts	
Energy Reduction	Mandated 4 pts		Energy Reduction	Mandated 8 pts				
	Incentivized 2 pts			Incentivized 4 pts				
Total		(out of 8)	Total		(out of 8)			

Energy Efficiency Scorecard

STATE					
AK	B	KY	F	NYC	A
AL	F	LA	B	OH	A
AR	F	MA	C	OK	D
AZ	B	MD	B	OR	B
CA	D	ME	F	PA	B
CO	A	MI	B	RI	A
CT	B	MN	A	SC	C
DC	A	MO	C	SD	B
DE	B	MS	D	TN	F
FL	C	MT	F	TX	D
GA	B	NC	C	UT	B
HI	B	ND	D	VA	B
IA	C	NE	D	VT	B
ID	B	NH	B	WA	B
IL	A	NJ	A	WI	B
Chicago	F	NM	C	WV	F
IN	D	NV	D	WY	C
KS	F	NY	A		

3

Labor Standards and Local Sourcing

Labor Standards

Certain states have prevailing wage laws that require contractors to pay their workers the prevailing wage rates for their respective trades and labor categories, as determined by surveys conducted by the state or the U.S. Department of Labor (DOL). However, not all states have such laws, and there are no states that currently incentivize contractors to establish a wage floor for each occupation that must be paid at or above the prevailing wage rate. States and local governments establish prevailing wage rates for public works projects, which reflect the wages and benefits typically paid to workers in a specific area for a specific type of work. At the federal level, the Davis-Bacon Act requires contractors and subcontractors working on federally-funded construction projects to pay their workers at least the prevailing wage rates for their respective craft and occupational categories, as determined by DOL through surveys of wages and benefits paid to workers in specific occupations and geographic areas. Davis-Bacon does not itself establish prevailing wage rates, but rather requires compliance with the prevailing wage rates determined by the DOL. However, even though LIHTC is a public subsidy of construction, paying a prevailing wage is not a mandate for LIHTC projects. While state and local governments may require prevailing wage and apprentice standards, LIHTC does not trigger developers to pay workers anything beyond a minimum wage.

Many LIHTC-awarded projects are often coupled with other funding streams that trigger prevailing wages and other labor standards. The U.S. Department of Housing and Urban Development's (HUD) HOME Investment Partnerships Program (HOME) provides formula grants to states and localities that communities use to fund building and rehabilitation of affordable housing for rent or homeownership, among other purposes. It's common to see affordable housing projects receive funds from HOME and

tax credits through LIHTC. Davis-Bacon labor standards are triggered for any project with 12 or more HOME-assisted units, meaning any LIHTC-HOME joint project will require workers to receive no less than the prevailing wages being paid for similar work in the area.³⁵

In California, 53% of construction worker families are classified as "low-income" or "very low-income."³⁶ Thus, projects that don't provide a prevailing wage can continue the cycle of poverty that results in families continuing to need to live in affordable housing developments. Lacking a connection between LIHTC subsidies and labor standards for workers also limits attracting workers to the profession if compensation and benefits are not competitive to other industries.

Not only does a prevailing wage assist workers to earn middle-class incomes in construction, it improves racial equity by lowering the wage gap. Research from the Illinois Economic Policy Institute shows that Black blue-collar construction workers earn 74 cents for every dollar by a comparable white (non-Latino) construction worker in states without prevailing wages and 88 cents in states with prevailing wage laws.³⁷

A prevailing wage should be the minimum acceptable standard, with the goal to provide a living wage. A living wage being the minimum wage that a worker needs to earn in order to cover their basic living expenses, such as housing, food, healthcare, and other necessities. Living wage laws are typically established by cities or municipalities and are often higher than the federal or state minimum wage.

As for other labor standards, only Washington, D.C. encourages the utilization of high-road union training programs. The District of Columbia QAP states a preference “will be awarded to projects that submit detailed plans for apprenticeship programs that facilitate the placement of D.C. residents in employment opportunities at the projects.”³⁸ Registered apprenticeship programs combine on-the-job training and classroom instruction and pre-apprenticeship programs are designed to prepare individuals for entry into an apprenticeship program. Outside of construction, industrial and other unions work with their employers on a variety of structures for labor-management training programs—some of which are registered apprenticeship programs—that provide a combination of classroom and on-the-job skills training.

These kinds of high-road union training programs are important and result in highly-skilled workers that can improve efficiency gains from investments, while job sites that use lower-skilled workers experience delays and difficulties adhering to safety regulations. These training programs also provide workers with job training and career development opportunities to help them gain new skills and advance their careers. They can also help to promote equity and fairness in the workplace by providing opportunities for individuals from underrepresented groups to access training and career advancement.

Local Sourcing

A handful of states incorporated provisions that prioritize locally or regionally-made products. Encouraging local purchasing can boost the local economy and support domestic manufacturing. Manufacturing jobs have traditionally had higher pay and better benefits than similar jobs in other sectors and are vital for rural areas. Insisting on U.S.-made products in close proximity to a project site helps sustain manufacturing of these products and their supply chains.³⁹

In Michigan, projects must demonstrate the use of products and goods that are manufactured by Michigan-based corporations and incorporate them into the project.⁴⁰ Arizona requires floor-ceiling truss assemblies for frame construction to be made in-state.⁴¹ And Louisiana and Nevada require applicants to submit documentation detailing regional material, labor and services and in-state products and goods incorporated into the development, respectively.^{42,43} Unfortunately, these are the only examples targeting locally-made products. Other states should consider similar policies that can help maintain quality jobs, generate local economic activity, and drive overall economic innovation. HFAs can use BGAF’s Building Clean website (www.buildingclean.org) as a tool to find building products made by U.S. manufacturers, including union manufacturers, that will support the creation of high-quality jobs.



Racial Equity Scorecard

STATE					
AK	D	LA	D	OK	D
AL	D	MA	D	OR	B
AR	C	MD	B	PA	D
AZ	F	ME	F	RI	B
CA	D	MI	B	SC	D
CO	C	MN	B	SD	D
CT	C	MO	D	TN	F
DC	B	MS	F	TX	D
DE	B	MT	D	UT	D
FL	C	NC	F	VA	D
GA	C	ND	C	VT	D
HI	F	NE	C	WA	B
IA	D	NH	D	WI	D
ID	D	NJ	C	WV	D
IL	B	NM	D	WY	D
Chicago	C	NV	D		
IN	B	NY	F		
KS	B	NYC	F		
KY	F	OH	B		

4

Racial Equity

Across the United States, affordable housing shortages and high energy costs significantly impact people of color who represent over 60% of low income renters.⁴⁴ LIHTC can lift up racial equity for developers, workers, tenants, and local communities via equitable affordable housing developments. Racial equity is an emerging topic within QAPs and HFAs have recently begun to make comprehensive efforts to address systemic discrimination and other disparities. Advancing racial equity in QAPs creates pathways for BIPOC residents to job opportunities, economic wealth, healthcare, and education. For the purposes of these criteria, the definition of racial equity by Race Forward is used, which characterizes racial equity as a “process of changing policies, practices, systems and structures by prioritizing measurable change in the lives of people of color, eliminating racial disparities and improving outcomes for everyone.”⁴⁵

Why Racial Equity Matters

Racial equity is important as people of color risk discrimination through biased developer selections, unfair tenant screening, and other discriminatory practices. What shaped and allowed these practices to persist can be traced back to historically racist housing policies in the United States such as redlining, exclusionary zoning, and urban renewal.⁴⁶ The BlueGreen Alliance’s Solidarity for Racial Equity Platform complements Building Clean’s priorities to achieve racial equity in the United States.⁴⁷ Evaluating affordable housing developments must consider underlying issues. Systemic racism and oppression are part of the nation’s fabric, and it should be no surprise that it’s interwoven within the confines of affordable housing.

Practices that contribute to achieving racial equity in states and cities are already in place within QAPs. These include hiring Minority Business Enterprises and Women Owned Business Enterprises (MBE/WBE) developers with a “lived

experience” in respective neighborhoods, meaning these developers feel the perception of race through racism and the racist structures that persist in society.⁴⁸ As well as eliminating screening practices that reject applicants with a history of eviction or poor credit scores, and including thresholds or incentives for amenities and service coordination such as broadband internet, homeownership counseling, and financial services.

Methodology

To begin, Building Clean conducted outreach and began identifying best practices in QAPs and QAP-adjacent documents. These best practices were inspired by the City of Chicago’s Racial Equity Impact Assessment (REIA), which developed eight emerging themes and recommendations to promote racially equitable outcomes and serve residents most in need.⁴⁹

BGAF collaborated with Ground Works Consulting for outreach with state practitioners and to develop criteria for the racial equity section. A series of exploratory interviews with 21 professionals in affordable housing development, research, policy, and tenants’ rights organizations were conducted to gather information about the most pressing issues and emerging best practices in the field. Interviewees also helped to identify additional people, organizations, and practices for the project team to explore.

The project team conducted a public input session where attendees were asked to share their experiences and recommendations based on these categories:

1. Place based risks and resources (location)
2. Community engagement
3. Access (who gets in and who is kept out)
4. Demographics of developers
5. Improving tenant outcomes
 - a. Asset building opportunities for tenants
 - b. Resident services
 - c. Housing quality

An advisory committee was then formed composed of professionals from different regions in the United States who worked on issues relating to LIHTCs, affordable housing, and racial equity. The advisory committee consisted of developers, policy advocates, tenants rights, and racial equity organizations who were asked to review draft criteria and provide structured feedback to the project team.

The project team used the findings from the exploratory interviews, public input session, and additional best practices research to revise a list of scorecard categories:

1. Access
 - a. Unit size
 - b. Depth of affordability
 - c. Outreach and affirmative marketing
 - d. Tenant screening
2. POC developers and service providers
3. Community engagement
4. Supportive services⁵⁰
5. Location/siting
 - a. Location in high opportunity area/proximity to amenities
 - b. Location far from dis-amenities

From the committee's feedback, the Access, Developers of Color, and Community Engagement categories received the highest ranking and were therefore given additional points to reflect their greater impact on racial equity. Members of the committee highlighted the need for an additional category to increase the transparency of the QAP process, and a sixth category titled Data Accountability and Transparency was added. The project team then made edits to the draft criteria and committee members were asked to provide a second round of feedback. The final revised criteria was then tested by the BGAF research team in an initial scoring of all state QAPs.

Within each category, there was often a criterion that was only met by a few states. These criteria in each category were designated as bonus points (Access; 1.2.3, Developers of Color and Service Providers; 2.4, Community Engagement; 3.2, Amenities and Services; 4.4, Location and Siting; 5.2.2, Data Accountability and Transparency; 6.3). Additionally, due to the nuance and overall lack of knowledge of racial equity, the final scores were graded on a curve in order to raise the participating HFA's average.

State Examples

Illinois

Racial equity is Illinois's first listed policy objective in the QAP stating their "approach to address racial equity is rooted in increasing five opportunities for wealth-building for BIPOC entrepreneurs as well as creating opportunities for community-level wealth expansion."⁵¹ Illinois has also developed a "Next Generation Capacity Building for BIPOC Developers" initiative which can increase greater diversity among LIHTC developers to possibly lead to more inclusive outcomes, including greater community engagement in the development process; greater diversity in the type of projects we see in the LIHTC rounds; and a more equitable distribution of the wealth generated by developer fees.⁵²

Oregon

Oregon has set forth an Equity and Racial Justice Goal for 2019-2023 based upon the objective to advance equity and racial justice by identifying institutional and systemic barriers that have created and perpetuated patterns of disparity in housing and economic prosperity.^{53,54} Further, Oregon Housing and Community Services (OHCS) requires each developer applying for LIHTCs to sign a Diversity, Equity, and Inclusion agreement. Signing this agreement registers the developer with the OHCS Equity, Diversity, and Inclusion Office and offers them an informal opportunity to discuss the approaches to this work. All LIHTC applicants are required to identify ways and/or targets they will use to contract with Minority-Owned, Woman-Owned, or Emerging Small Business (MWESB) contractors/subcontractors in the construction and operation of the proposed project.

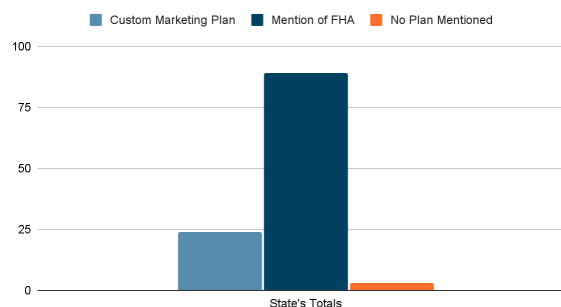
Findings

No state, city, or district scored an 'A' within the racial equity criteria, and only 12 states managed to score a 'B.' The findings section presents an overarching analysis of what in these states' QAPs elevated them among the majority.

The Access section was designed to ensure that housing units financed with LIHTCs are designed to meet the needs of people of color so they can afford to live in LIHTC-financed units; they are aware of LIHTC-financed housing opportunities; and are not automatically screened-out based on criteria that disproportionately affect residents who are people of color. States that achieve points for this section share LIHTC incentives in areas of unit size, design, and depth of affordability. Christina Bollo from the University of Oregon notes that "the subject of dwelling size, and dwelling size change, is interdisciplinary, simultaneously architectural, sociological and political..."⁵⁵ Those in search of low-income housing require units of different sizes depending on factors such as the number of possible tenants, family size, accessibility requirements, and others.

Illinois and Kansas performed well in *Unit Size and Design* criteria by implementing incentives and requirements to analyze housing needs among different racial and ethnic groups while ensuring there are units made accessible to larger families and disabled populations. An essential element of equitable access seen growing within state QAPs is Universal Design. Universal Design is the design and composition of an environment so that it can be accessed, understood, and used to the greatest extent possible by all people regardless of their age, size, ability, or disability.⁵⁶ Illinois provides an incentive that "a Project can earn up to seven (7) points for providing an additional ten (10) elements above mandatory Universal Design requirements, and not required by code, in one hundred percent (100%) of units." States can partially improve their Unit Size and Design criteria score by providing or aligning resources to assist developers to meet design accessibility standards. For example, while Illinois provides an incentive for utilizing Universal Design, they also provide examples of Universal Design requirements as well as architectural standards and an amenities certification.⁵⁷ The certification provides written confirmation of accessibility codes and Fair Housing Act (FHA) requirements (if any) that are applicable to the project. The certification also provides written confirmation and identification of specific project features which meet minimum code requirements. Both the standards and certifications are present to assist in generating an accessible development.

Approach to Marketing in QAPs

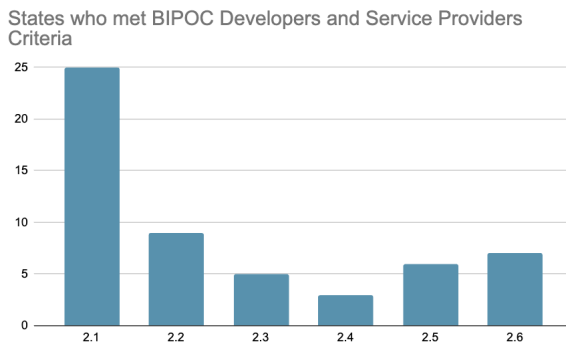


The *Depth of Affordability* criteria section found that nearly 88% of states implement incentives or requirements that either combine LIHTC with other financing sources or offer targets for very low-income units. Delaware has a state landlord/tenant code that prohibits penalties above 5% for late rent payments. Washington—in order to encourage developers to pursue discounted utility and internet costs—requires a "Utility Incentive Contact" in which the applicant must contact their utility(ies) before submitting a 9% Competitive Tax Credit Application to discuss qualifying for energy efficiency incentives. These incentives can significantly lower the costs associated with constructing energy-efficient buildings.

In the *Outreach and Affirmative Marketing* section BGAF found that states who met these criteria, such as Maryland and North Dakota, did so through a separate affirmative outreach and marketing plan. However, during the scoring process it was found that the FHA, which is federally required, could be used to fulfill all criteria in this section. Despite this, research shows that not all states adhere to the legislation. The FHA is intended to outlaw explicit housing discrimination due to race, color, religion, sex, disability, familial status, or national origin and to reduce housing inequality. HUD ensures that "federal law requires that applicants for participation in HUD's subsidized and unsubsidized housing programs pursue affirmative fair housing marketing policies. This is to help ensure that individuals of similar income levels in the same housing market area have a like range of housing choices available."⁵⁸ However, it's difficult to determine which states are adhering to the FHA in their marketing and outreach materials.

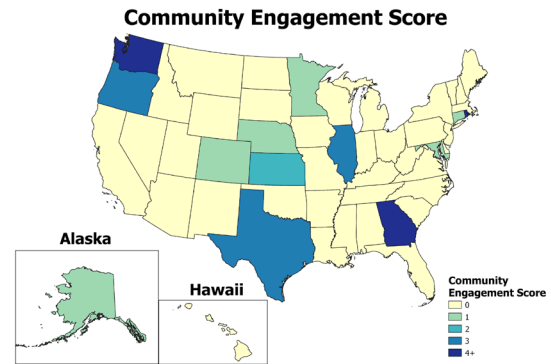
Only seven states achieved any of the criteria in the *Tenant Screening* category. Ohio was one of the only two states that met each standard in this section. What makes Ohio's QAP unique in this respect is it explicitly prohibits the denial of housing applicants on the basis of evictions and arrest records alone, and forbids developers from advertising that tenants with eviction history cannot apply. Furthermore, LIHTC developers in Ohio are not allowed to use eviction records or credit reports with a failure to pay rent or utilities during the COVID-19 emergency period to reject applicants.

In the scoring of the *BIPOC Developers and Service Providers* section incentives were usually provided for non-profit developers and service providers and BIPOC developers and service providers. Indiana requires 15% of available annual LIHTCs be set-aside for qualified non-profit organizations that will be awarded if certain requirements are met.



Nearly half of all LIHTC financed entities include incentives, set-asides, or threshold requirements for BIPOC-owned or controlled developers and teams, including a definition of a BIPOC-owned/controlled entity. Chicago's QAP includes a "preference for development teams with BIPOC-led developers, professional service teams and/or service providers and for Joint Ventures or Partnerships that ensure small, BIPOC-led firms and nonprofits have material participation in a manner that promotes their growth." This is significant as it signals that states already understand the collective impact of contracting local, MBE developers. Incentives for partnerships and financing tools to assist BIPOC developers were mostly absent in state QAPs. MBE developers enter their field of work already at a deficit due to disproportionate access to developing financial strength and other forms of assistance. Establishing eligibility pathways in addition to partnerships are imperative so that newer organizations to LIHTC deals are not excluded by financial strength or experience criteria. Examples of eligibility pathways are items such as training or demonstrated consultant support which would count towards developer experience.

Most state HFAs lack a collaborative process between decision-makers and those who are affected by those decisions. Community engagement, a core tenet for racial equity, is absent in most QAPs. The Community Engagement Score map to the right shows the disconnect between the individuals and communities LIHTC projects are meant to serve and HFAs who structure these benefits. Only 13 states consider community engagement as an incentive for QAP points. One example of a notable community engagement strategy is in Washington state where "Geographically Based Communities," are centered around a specific place, such as a neighborhood. This policy uses community-based organizations (CBOs) as a means of community representation in the LIHTC development.



Forty-seven states met the thresholds for projects being developed in high opportunity areas, as shown in criteria 5. However, while a majority of state QAPs include this provision, this criteria also raises several contradictions. A report from Case Western Reserve University argued this "opportunity paradigm" implies that to access opportunity and social mobility, low-income people of color would have to move from their communities into "opportunity neighborhoods."⁵⁹ This would further devalue already disinvested neighborhoods of color as individuals who serve as community assets would be removed. In order to avoid this disinvestment, revitalization must be done in a way that combines place-based investments, desegregation of communities, and social mobility goals. This will contribute to racial equity in states and allow tenants to have sustainable neighborhoods. This method of revitalization is something that should be a combined effort between HFAs, planning agencies, and local government.

Many low-income families and communities of color involuntarily live in or in proximity to locations impacted by environmental health risks and exposures. Redlining, disinvestment, and environmental injustice are all intertwined within the racist history of the United States. Each state has the potential to reduce its inhabitants' environmental health risks, however only 18 states include criteria that aim to minimize and manage risk exposure within the bounds of their QAP.

Every state and city lacked criteria for Data Accountability and Transparency. QAPs should offer methods for states to track racial equity outcomes from LIHTC project data such as tenant and project team demographics. Some examples of states that are starting or have already started to participate in data accountability and transparency are Oregon, whose fund offerings require demographic information from the proposed general contractors, and North Dakota, where tenant demographic reporting is required as part of the annual compliance monitoring process.

Conclusion

LIHTCs have an overriding goal of providing quality, affordable rental housing to low-income people—a goal that's vital with the current shortage of affordable and available rental homes for low-income and extremely low-income households. HFAs have a litany of policies to consider when developing and/or modifying their QAP. What can't be ignored, however, is the health of residents and workers, the energy efficiency of housing developments, labor standards, and racially equitable housing policies.

What this report shows is there continues to be an uptick in health-focused provisions in QAPs. More states are mandating and incentivizing green building certifications, and more nuanced health-related building criteria are being added to QAPs. For example, in a review of green building practices in 2006, Global Green discovered that state QAPs rarely included criteria targeting no-VOC paint, low-VOC carpet or formaldehyde-free products, with only eight, six, and seven states listing these criteria in their QAP,

respectively.⁶⁰ This report shows the number of states specifically mentioning this criteria has significantly expanded, and that's without considering the increased use of green building certifications, many of which include these provisions as part of their standards.

While states met many of the criteria in the "healthy building practices" and "energy efficiency" sections, they are inadequate in the "racial equity" and "labor standards" sections. There is hope that states will be more diligent in including provisions addressing racial discrimination and inequities, as these issues have been prioritized in a handful of states through community engagement and outreach efforts and racial equity impact assessments. States also need to reevaluate ways to revitalize America's manufacturing sector and incentivize union labor to build pathways into the middle-class and create a more equitable economy for all.



Appendix

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Healthy Building Practices

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Energy Efficiency

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**Labor Standards and
Local Sourcing**

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Racial Equity

Grading Scale

	Healthy Building Practices	Energy Efficiency	Racial Equity
A	19-20	18-20	15-20
B	14-18	15-17	9-14.5
C	10-13	10-14	6-8.5
D	6-9	6-9	3-5.5
F	0-5	0-5	0-2.5

	Healthy Building Practices		Energy Efficiency		Racial Equity		Overall	
State	Points	Grade	Points	Grade	Points	Grade	Total Points	Grade
AK	0	F	8	D	3	D	11	D
AL	6	D	1	F	5	D	12	D
AR	0	F	0	F	6.5	C	6.5	D
AZ	10	C	16	B	2.5	F	28.5	C-
CA	3	F	8	D	5	D	16	D
CO	20	A	18	A	7	C	45	B+
CT	17	B	16	B	7	C	40	B-
DC	20	A	18	A	9.5	B	47.5	A-
DE	14	B	16	B	9	B	39	B
FL	12	C	10	C	8.5	C	30.5	C
GA	20	A	16	B	7.5	C	43.5	B
HI	10	C	16	B	2.5	F	28.5	C-
IA	16	B	12	C	4	D	32	C
ID	20	A	15	B	3	D	38	B-
IL	20	A	18	A	11.5	B	49.5	A-
Chicago	0	F	0	F	6.5	C	6.5	D
IN	10	C	8	D	12	B	30	C
KS	4	F	4	F	11	B	19	D
KY	0	F	0	F	1.5	F	1.5	F
LA	17	B	16	B	5.5	D	38.5	C+
MA	20	A	14	C	4	D	38	C+
MD	18	B	16	B	9	B	43	B
ME	8	D	2	F	2.5	F	12.5	F
MI	20	A	16	B	9.5	B	45.5	B+
MN	20	A	20	A	12	B	52	A-
MO	12	C	10	C	5.5	D	27.5	C-

	Healthy Building Practices		Energy Efficiency		Racial Equity		Overall	
MS	18	B	8	D	2	F	28	D+
MT	4	F	1	F	4	D	9	F
NC	0	F	12	C	2.5	F	14.5	D
ND	10	C	8	D	6	C	24	C-
NE	4	F	1	F	6.5	C	11.5	D
NH	17	B	16	B	3	D	36	C+
NJ	10	C	18	A	7	C	35	B-
NM	8	D	14	C	4.5	D	26.5	D+
NV	12	C	8	D	3	D	23	D+
NY	21	A	20	A	2	F	43	B-
NYC	20	A	18	A	2	F	40	B-
OH	20	A	18	A	9	B	47	A-
OK	2	F	6	D	3.5	D	11.5	D
OR	20	A	16	B	11.5	B	47.5	B+
PA	10	C	16	B	4	D	30	C
RI	12	C	19	A	9.5	B	40.5	B
SC	9	D	12	C	5	D	26	D+
SD	8	D	16	B	3.5	D	27.5	C-
TN	0	F	2	F	2.5	F	4.5	F
TX	10	C	9	D	5.5	D	24.5	D+
UT	10	C	16	B	4	D	30	C
VA	10	C	17	B	4.5	D	32.5	C
VT	19	A	16	B	4	D	39	B-
WA	21	A	16	B	11	B	48	B+
WI	20	A	16	B	3	D	39	B-
WV	0	F	0	F	3.5	D	3.5	F
WY	0	F	14	C	4.5	D	18.5	D
AVERAGE	10	C	15	B	4.5	D	30	C

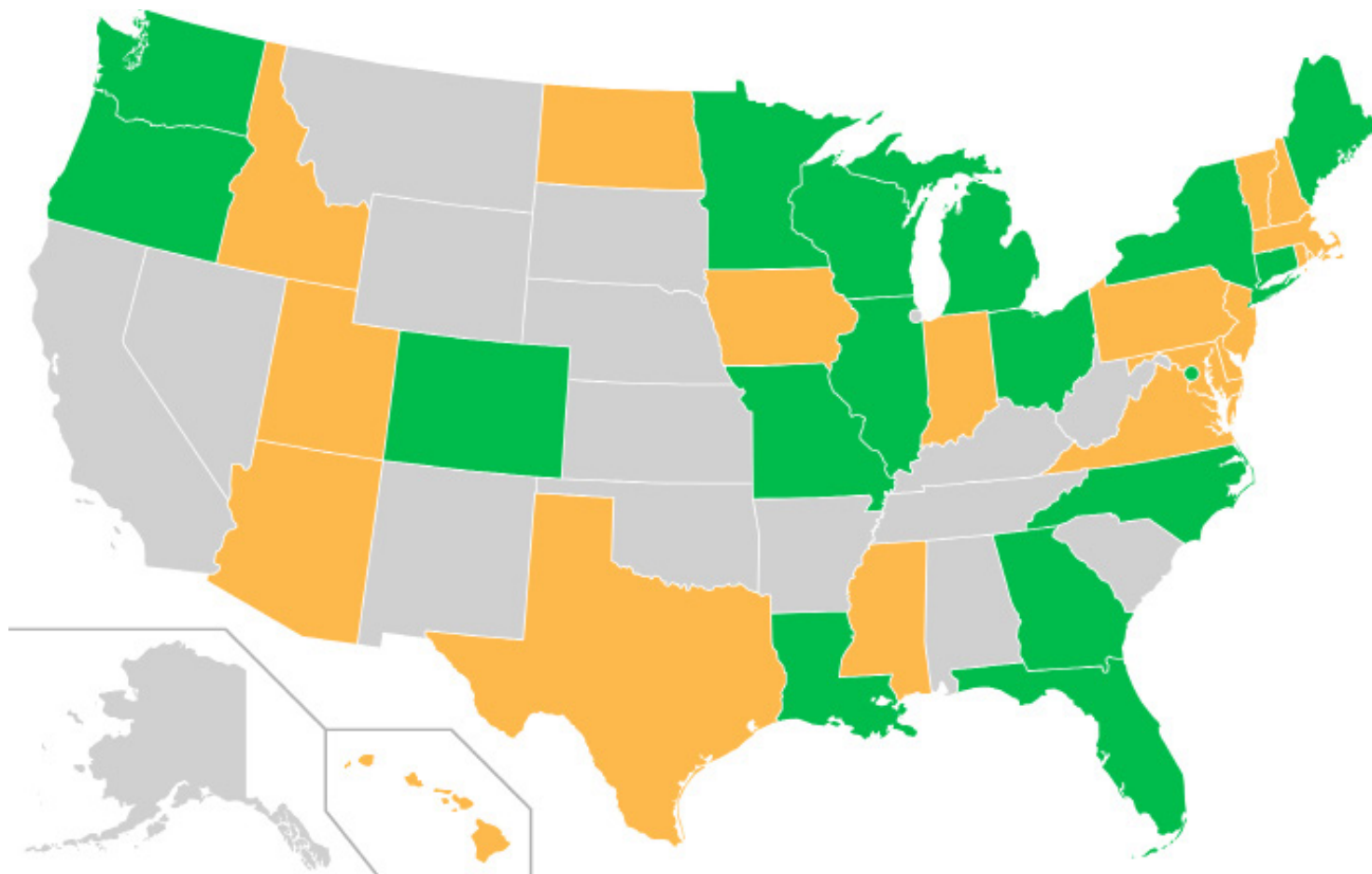
Healthy Building Practices

M = Mandatory
I = Incentivized

	New Construction					
	Green Building Certification	Low-VOC	Ventilation	Formaldehyde-Free	Radon-Resistant	Healthy Carpeting
AK						
AL		I			M	
AR						
AZ	I	M	M			M
CA		I				
CO	M				M	
CT	I	M				
DC	M					
DE	I	M				
FL	M	M				
GA	M	M			M	
HI	I					
IA	I	M	I	M	I	M
ID	I	M	M	I		I
IL	M/I	M	M	M	M	
CHI						
IN	I					
KS					M	
KY						
LA	M		M			
MA	I	M		M	M	
MD	I	M		M		M
ME			M			M
MI	M	M	M			

	New Construction (Continued)					
	Green Building Certification	Low-VOC	Ventilation	Formaldehyde-Free	Radon-Resistant	Healthy Carpeting
MN	M/I		M			
MO	M		M			
MS	I	I		I		
MT						
NC						
ND	I					
NE		M				
NH	I	M				I
NJ	I					
NM		M				M
NV		M	M		M	
NY	M	M	M	M		
NYC	M					
OH	M				M	
OK		I				
OR	M	M				
PA	I					
RI	I				M	
SC	I				M	
SD		M		M		
TN						
TX	I					
UT	I					
VA	I					
VT	I	M	M		M	
WA	M					
WI	M					
WV						
WY						

States with Green Building Certifications in New Construction Projects



- Mandated
- Incentivized
- No mandate or incentive

M = Mandatory
I = Incentivized

	Moderate Rehabilitation					
	Green Building Certification	Low-VOC	Ventilation	Formaldehyde-Free	Radon-Resistant	Healthy Carpeting
AK						
AL		I			M	
AR						
AZ						
CA		I				
CO	M				M	
CT	M					
DC	M					
DE	I	M				
FL				I		I
GA	M					
HI	I					
IA		M		M		M
ID	I	M	M	I		I
IL	M	M	M	M		
CHI						
IN						
KS					M	
KY						
LA	I		M			
MA		M		M	M	
MD		M	M	M		M
ME			M			M
MI	M	M	M			
MN	M		I			

	Moderate Rehabilitation (Continued)					
	Green Building Certification	Low-VOC	Ventilation	Formaldehyde-Free	Radon-Resistant	Healthy Carpeting
MO			M			
MS	I	I		I		
MT						
NC						
ND	I					
NE		I				
NH	I	M				M
NJ	I					
NM		M				M
NV		M	M		M	
NY	M	M		M		
NYC	M					
OH	M				M	
OK		I				
OR	M					
PA	I					
RI	I					
SC					M	
SD		M		M		
TN						
TX	I					
UT	I					
VA	I					
VT	I	M			M	
WA	M					
WI	M					
WV						
WY						

	Bonus Criteria	
	Insulation	
AK		MO
AL		MS
AR		MT
AZ		NC
CA	X	ND
CO		NE
CT		NH
DC		NJ
DE		NM
FL		NV
GA		NY
HI		NYC
IA		OH
ID		OK
IL		OR
CHI		PA
IN		RI
KS		SC
KY		SD
LA		TN
MA		TX
MD		UT
ME		VA
MI		VT
		WA
		WI
		WV
		WY

	New Construction		Moderate Rehabilitation		Green Building Certifications Referenced
State	Required	Incentivized	Required	Incentivized	
AK					
AL					
AR					
AZ		X			EGC, LEED, NGBS
CA					
CO	X		X		EGC, LEED, NGBS, ZERH, Passive House
CT		X	X		EGC, LEED, NGBS, LBC
DC	X		X		EGC
DE		X		X	EGC, LEED, NGBS
FL	X				EGC, LEED, NGBS, Florida Green Building Coalition
GA	X		X		EGC, LEED, NGBS, EarthCraft, Green Globes
HI		X		X	EGC, LEED, NGBS
IA		X			EGC, LEED, NGBS
ID		X		X	EGC, LEED, NGBS, Passive House, Indoor Air Plus
IL	X*	X	X*	X	EGC, LEED, NGBS, Passive House, LBC Core
CHI					
IN	X				EGC, LEED, NGBS
KS					
KY					
LA	X			X	EGC, LEED, NGBS, EarthCraft
MA		X		X	EGC, LEED, Passive House
MD		X			EGC, LEED, NGBS, EarthCraft, Green Globes
ME					
MI	X	X	X	X	EGC, LEED, NGBS
MN	X	X	X		EGC (MN overlay), ZERH, Passive House
MO	X				EGC, LEED, NGBS
MS		X		X	EGC, NGBS

	New Construction		Moderate Rehabilitation		Green Building Certification Options
MT					
NC					
ND		X		X	EGC, LEED, NGBS
NE					
NH		X		X	EGC, LEED, NGBS, Passive House, ILFI Net Zero
NJ		X		X	EGC, LEED, NGBS, LBC, Passive House, Climate Choice Homes Program
NM					
NV					
NY	X	X	X	X	EGC, LEED, Passive House
NYC	X		X		EGC (NYC overlay), LEED
OH	X		X		EGC, LEED, NGBS
OK					
OR	X		X		EGC, LEED, Earth Advantage
PA		X		X	EGC, LEED, NGBS
RI		X		X	Passive House or net zero
SC		X			EGC, LEED, NGBS, EarthCraft, CHiP Home Program
SD					
TN					
TX		X		X	EGC, LEED, NGBS
UT		X		X	EGC, LEED, NGBS
VA		X		X	EGC, LEED, NGBS, EarthCraft
VT		X		X	Passive House
WA	X		X		Evergreen Sustainable Development Standards
WI	X	X	X	X	WI Green Built Home Standard, EGC
WV					
WY					

* An Enterprise Green Communities certification is not required, but each project must adhere to the mandatory criteria of EGC.

EGC – Enterprise Green Communities
 LEED – Leadership in Energy and Environmental Design
 NGBS – ICC 700 National Green Building Standard
 LBC – ILFI Living Building Challenge

Energy Efficiency

M = Mandatory
I = Incentivized

	New Construction		
	ENERGY STAR	Green Building Certification	Energy Reduction
AK	I		
AL			
AR			
AZ		I	I
CA			
CO		M	
CT		I	I
DC		M	
DE		I	I
FL		M	
GA		M	
HI	I	I	
IA	M	I	I
ID		I	I
IL		M/I	
CHI			
IN		M	
KS	I		
KY			
LA	M (prescriptive requirements)	M	
MA		I	I
MD	M	I	
ME			
MI		M/I	

MN		M/I	
MO		M	
MS		I	
MT			
NC	M		
ND		I	
NE			
NH	M	I	
NJ	M	I	
NM			M
NV	M		
NY		M/I	
NYC		M	
OH	M	M	
OK			I
OR		M	
PA	M	I	I
RI	I	I	M
SC	M	I	
SD	I		I
TN			
TX		I	
UT	M	I	
VA	M	I	
VT	M	I	
WA		M	
WI		M/I	
WV			
WY	I		I

M = Mandatory
I = Incentivized

	Moderate Rehabilitation		
	ENERGY STAR	Green Building Certification	Energy Reduction
AK	I		
AL			
AR			
AZ			M
CA			M
CO		M	
CT		M	M
DC		M	
DE		I	I
FL			
GA		M	
HI	I	I	
IA			I
ID		I	I
IL		M/I	
CHI			
IN			
KS			
KY			
LA	M	I	
MA			I
MD			M
ME			
MI		M/I	
MN		M/I	

MO			
MS		I	
MT			
NC	I		
ND		I	
NE			
NH	M	I	
NJ	M	I	M
NM			M
NV			
NY		M/I	
NYC		M	
OH	M	M	
OK			
OR		M	
PA		I	M
RI		I	M
SC			
SD	I		I
TN			
TX		I	
UT	M	I	
VA		I	M
VT		I	
WA		M	
WI		M/I	
WV			
WY	I		I

M = Mandatory
I = Incentivized

	Bonus Criteria	
	Water Conservation	Benchmarking
AK		
AL	I	
AR		
AZ	M	
CA		
CO		M
CT		M
DC		M
DE		M
FL	M	
GA		
HI		
IA		
ID	I	
IL	I	
CHI		
IN		
KS		
KY		
LA		
MA		
MD		
ME	M	
MI		
MN	M	M

MO	M	
MS		
MT	I	
NC		
ND		
NE	I	
NH		
NJ		M
NM	M	
NV		
NY	M	M
NYC		M
OH	M	
OK		
OR		
PA		
RI	M	I
SC	M	M
SD	M	
TN	M	
TX	I	
UT		
VA	I	
VT	M	M
WA		
WI		
WV		
WY		

Labor Standards and Local Sourcing

	Prevailing Wages	Apprenticeship Training	Buy Local	Hire Local
AK				
AL				
AR				
AZ			X	
CA				
CO				X
CT				X
DC		X		
DE				X
FL				
GA				
HI				
IA				
ID				
IL		X		X
CHI		X		X
IN				
KS				
KY				
LA			X	X
MA				
MD				
ME				
MI			X	

	Prevailing Wages	Apprenticeship Training	Buy Local	Hire Local
MN				
MO				
MS				
MT				
NC				
ND				
NE				
NH				
NJ				
NM				
NV			X	X
NY				
NYC				
OH				
OK				
OR				
PA				
RI				X
SC				
SD				
TN				
TX				
UT				
VA				
VT				
WA				
WI				X
WV				
WY				

Racial Equity Narrative

BGAF contracted with Ground Works Consulting to develop scoring criteria and methodology for this report. While much of the racial equity section is derived from this work, the unedited, complete, narrative—with input from an advisory committee and BGAF staff—is listed below.

QAP Scorecard – Racial Equity Criteria

The following categories and criteria were developed to evaluate the extent to which states advance racial equity in the allocation of Low Income Housing Tax Credits (LIHTC) through their Qualified Allocation Plans (QAPs) and other policies. For the purposes of these criteria, the definition of racial equity by Race Forward is used, which characterizes racial equity as a process of changing policies, practices, systems and structures by prioritizing measurable change in the lives of Black, Indigenous and People of Color (BIPOC), eliminating racial disparities and improving outcomes for everyone.⁶¹

Approach

The following describes the three phases in which the project team conducted outreach and collected information about best practices (phase I), convened an advisory committee (phase II), and developed and refined scoring criteria (phase III).

Phase I: Initial Research and Category Development

The research and findings of the City of Chicago's Racial Equity Impact Assessment (REIA) of their QAP was taken as a starting point to develop an initial list of categories as they relate to advancing racial equity via affordable housing production and provision.⁶² A series of exploratory interviews with 21 professionals in affordable housing development, research, policy, and tenant's rights organizations were conducted to gather information about the most pressing issues as well as best practices emerging in the field. Interviewees also helped to identify additional people, organizations, and practices for the project team to explore.

The final element of phase I involved a public input session, held on March 3, 2022, and advertised in Shelterforce, an online community development magazine where many practitioners learn about events and which published an article on Chicago's REIA in 2021.^{63,64} In the session, the project team introduced the scorecard project and initial research. For the purposes of the March 3 meeting—and building off the Chicago REIA research—the project team presented a preliminary set of categories where LIHTC intersects with racial equity and then asked participants to

share their experiences and recommendations for further research and outreach. The preliminary categories presented during the meeting were:

1. Place-based risks and resources (location)
2. Community engagement
3. Access (who gets in and who is kept out)
4. Demographics of developers
5. Improving tenant outcomes
 - a. Asset building opportunities for tenants
 - b. Resident services
 - c. Housing quality

From the exploratory interviews and the public input session, it was made clear that many policies and practices that can influence how LIHTC-financed projects advance racial equity would not be found in QAP documents themselves, but rather in other policies and guidance from HFAs or other state agencies. Furthermore, during this phase, the project team decided that the housing quality category overlapped with many of the criteria being developed in other sections of the scorecard and was therefore removed from this section. Finally, the interviewees highlighted that many of the draft categories and practices that emerged from Chicago's REIA are not well covered by state QAPs and HFAs. In other words, racial equity is still a very nascent field in the LIHTC ecosystem. Nevertheless, recognizing the important role that LIHTC plays in shaping the affordable housing field, the project team decided to keep the remaining categories to encourage the adoption of the types of practices and policies emerging from this and adjacent community development fields.

Phase II: Convening an Advisory Committee

For the second phase of the project, the project team sought to identify a group of practitioners that could represent a range of perspectives on LIHTC, affordable housing, and racial equity. The purpose of the advisory committee was to provide input and feedback to criteria drafting, but the decisions about the final set of criteria and descriptions below were made by the BGAF and consultant team. Based on the exploratory interviews, and seeking representation from developers, policy advocates, tenants rights, and racial equity organizations, a subset of individuals from the exploratory interviews was invited to join an advisory committee to review drafts and provide more structured feedback to the project team. The advisory committee consisted of nine individuals from organizations from the east coast, west coast, and midwest as well as several national organizations.⁶⁵ Representatives from HFAs were not invited to join the advisory committee, as their agencies are the subject of the scorecard, which could pose a conflict of interest.

Phase III: Developing and Refining Scoring Criteria

The project team translated the findings from the exploratory interviews, public input session, and additional best practices research into a revised list of scorecard categories:

1. Access
 - a. Unit size
 - b. Depth of affordability
 - c. Outreach & affirmative Marketing
 - d. Tenant screening
2. BIPOC developers & service providers
3. Community engagement
4. Supportive services⁶⁶
5. Location/siting
 - a. Location in high opportunity area/proximity to amenities
 - b. Location far from dis-amenities

Criteria were based on best practices emerging from the affordable housing, community development, and racial equity fields. The advisory committee reviewed the draft criteria and provided detailed feedback in an online survey.^{67,68} Committee members were asked how they would modify criteria and which criteria and categories they believed had greater impact on racial equity. From their feedback, the following categories received the highest ranking: Access (depth of affordability and tenant screening), BIPOC developers, and Community Engagement, and were therefore given additional points to reflect their greater impact on racial equity.

Following the online survey, committee members met to discuss places of divergence in their feedback. During that meeting, members highlighted the need for an additional category to increase transparency of QAP process, and the sixth category of data accountability and transparency was added. The project team then made edits to the draft criteria, and committee members were asked to provide a second round of feedback. The final revised criteria were then tested by BGAF research team in an initial scoring of all state QAPs.

Draft Racial Equity QAP Scoring Criteria

1. Access

To ensure that LIHTC developments support the narrowing of racialized health, wealth, and other outcome gaps, it is important that LIHTC developments are designed to meet the needs of BIPOC populations and that BIPOC residents are able to access them. Access is manyfold and means that a) housing units financed with LIHTC are designed to meet the needs of BIPOC groups, b) BIPOC groups can afford to live in LIHTC-financed units, c) BIPOC residents are aware of LIHTC-financed housing opportunities, and d) BIPOC groups are not automatically screened out based on criteria that disproportionately affect BIPOC residents. As such, the access criteria in this section are divided into the above four sub-category sections.

1.1 Unit Size and Design [up to 3 points]

An analysis of housing needs that is disaggregated by race and ethnicity helps Housing Finance Authorities (HFAs) understand household composition and needs of different racial/ethnic groups, so that they can ensure that policies and practices are in place to ensure that LIHTC-funded units meet the needs of BIPOC households. For example, researchers have found a lack of family-sized affordable housing units that can accommodate larger household sizes of different BIPOC groups in high opportunity neighborhoods.⁶⁹ Furthermore, research has also shown that certain BIPOC groups are disproportionately

represented in disabled populations, and therefore taking into consideration the intersection of race/ethnicity and disability status is also an important lens for advancing racial equity in the affordable housing industry.⁷⁰ Finally, facilitating ongoing accommodations for elderly and disabled residents also allows for multigenerational households and aging in place. Minnesota's LIHTC self-scoring worksheet is a good example of granting preferential points based on housing needs that include large family sizes and disabilities.⁷¹

1.2 Depth of affordability [up to 6 points]

BIPOC households are disproportionately represented among the very low and extremely low household income categories in every state.⁷² As a result, using LIHTC to target and meet the affordability needs of BIPOC households may require additional and deeper subsidies to house more very low and extremely low-income tenants. Most QAPs require the production of very low and extremely low-income units and also offer additional points for projects that provide deeper subsidies. For example, South Carolina's QAP includes points for projects that reserve 10% or more units

for disabled residents earning below 20% AMI.⁷³ In order to keep monthly rents low, many QAPs offer incentive points to projects that leverage federal rental assistance and other subsidy sources, as in the Illinois QAP. Finally, in addition to establishing ongoing affordable rents, LIHTC projects can further deepen accessibility by prohibiting excessive fees for late payments and encouraging developers to reduce utility and internet costs.

1.3. Outreach/affirmative marketing [up to 4 points]

LIHTC projects must use outreach and marketing to reach prospective BIPOC tenants since many communities—especially those that are rich in resources like good schools, healthy environments, and safe streets—have a history of excluding people of color through different methods, such as redlining, violence and intimidation, and zoning, among others.⁷⁴ The historic legacy of exclusion is reinforced by the difficulty of staying informed about affordable rental opportunities and application processes, especially in areas where BIPOC residents may lack friends, family, or other community connections.

While racial discrimination has led to legal requirements for developers to conduct affirmative marketing for affordable projects receiving Federal funding, the IRS does not have such requirements for LIHTC projects, which leaves affirmative marketing enforcement to the states. Over a decade ago, the Poverty & Race Research Action Council recommended that Federal and State HFAs provide uniform affirmative marketing and tenant selection guidelines, but in today's practice, LIHTC marketing approaches vary widely without a consistent standard.⁷⁵ Studies have shown that affirmative marketing and rental criteria successfully increase racial diversity at a housing site throughout the life of the development.⁷⁶

To ensure that BIPOC communities are aware of affordable housing opportunities and can apply for them, developers need to adopt targeted and culturally specific marketing approaches. These include identifying which applicants are least likely to apply and using community connections and culturally specific outreach to inform them. Massachusetts, New Jersey, and Connecticut have enacted their own affirmative marketing regulations. For instance, Massachusetts requires informal meetings for people to learn about the project and receive application assistance. Connecticut requires that 20% of LIHTC-funded units be marketed to those “least likely to apply”—specifically, people who are not the dominant race in the area of the development and those who do not live in the area because of racial or ethnic patterns, perceived community attitudes, price, or other factors. New Jersey also requires a regional marketing strategy to reach tenants from outside the area.⁷⁷ NYU's Furman Center found that successful affirmative marketing can include tours, door-to-door outreach in targeted neighborhoods, and partnerships with community-based groups.⁷⁸

Criteria	Points
1.3.1 QAP and/or supporting policies require developers to translate marketing materials into non-English languages based on the prevalence of language groups for low-income populations in the region and demonstrate knowledge of the media, organizations, languages and cultures of the proposed population to be served by the development.	1
1.3.2. QAP and/or supporting policies require developers to provide support to prospective tenants for filling out applications.	1
1.3.3. QAP and/or supporting policies encourage developers to work with community-based and BIPOC-led organizations to design outreach and marketing materials and strategy.	1
1.3.4. QAP and/or supporting policies encourage outreach to and preference points for tenants who were displaced from the neighborhood and/or historically excluded from the area.	1
Total awardable points for sub-category	4

1.4. Tenant Screening [up to 7 points]

Tenant screening is an additional barrier for BIPOC residents to access LIHTC-financed affordable housing. As a result of federal and local housing discrimination and other policies and practices that have historically excluded them from the same opportunities extended to white residents, Black, Native, Latinx, and other residents are more likely to experience poverty and financial instability.⁷⁹ These economic disparities leave BIPOC communities at higher risk for housing insecurity, having low or no credit histories, and evictions.^{80,81,82} In addition, BIPOC communities are disproportionately impacted by the criminal justice system and are more likely than whites to be stopped by police, arrested, and prosecuted for similar crimes.⁸³ Common tenant screening practices for credit histories and records, therefore disproportionately impact BIPOC residents.⁸⁴

Oregon's QAP includes incentives for implementing low-barrier tenant screening, which includes making applications straightforward, matching criteria to the target populations, and avoiding using third parties that conduct blanket sweeps.⁸⁵ Some QAPs, such as Ohio's, explicitly prohibit the denial of housing applicants on the basis of evictions and arrest records alone and forbids developers from advertising that tenants with eviction cannot apply.⁸⁶ Furthermore, LIHTC developers in Ohio are not allowed to use eviction records or credit reports with a failure to pay rent or utilities during the COVID-19 emergency period to reject applicants.

Criteria	Points
1.4.1. QAP and/or supporting policies prohibit automatic rejection based on credit record history alone and/or requires the consideration of circumstances such as domestic violence survivors and COVID-related debts that may impact the applicant's financial records.	2
1.4.2. QAP and/or supporting policies prohibit automatic rejection based on conviction record history and consider the nature, severity, and timing of conviction.	2
1.4.3. QAP and/or supporting policies prohibit automatic rejection based on eviction record history.	2
1.4.4. QAP and/or supporting policies require developers establish and offer an appeals process for applicants that suspect they were unfairly screened out and give the tenant applicant an opportunity to provide mitigating information before denying housing based on upon the result of screening.	1
Total awardable points for sub-category	7

2. BIPOC Developers & service providers [up to 6 points]

The affordable housing industry is not as diverse as the tenants it serves.⁸⁷ BIPOC developers have faced barriers to participating in and benefiting from the LIHTC development industry, including both hiring discrimination and lending discrimination, and systemic racism has created a gap in access to capital.⁸⁸ A plethora of emerging practices, policies, programs, and tools are diversifying the industry, so that affordable housing not only benefits BIPOC tenants, but also the full range of organizations and people that are part of its ecosystem. For example, the Massachusetts QAP awards points for the inclusion of certified Minority/Women's Business Enterprise members as sponsor/owners, architects, consultants, management agents, contractors and professional service staff, as well as for a team's track record of using M/WBEs.⁸⁹ The Illinois QAP awards points for BIPOC sponsors based on their stake in controlling the development.⁹⁰ Ohio's QAP gives a 115% base boost for minority or women-led development businesses that are Majority General Partners in the ownership structure.⁹¹ Oregon's QAP requires applicants to demonstrate strategies and targets for contracting with minority, women, and/or emerging small businesses including demonstration of previous contracting.⁹²

In order to award points, QAPs need to define BIPOC control and/or lived experience for project sponsors. For example, Washington's bond and tax credit policies include points for BIPOC board members and directors, as well as thresholds for ownership and partnership.⁹³ Washington's 4% Bond Manual also defines lived experience as "personal knowledge about the world gained from identifying as a member of the affected group, either currently or at some point in life."⁹⁴

QAPs can also incentivize community-led projects. Currently, federal law requires that all states set aside 10% of their LIHTC for non-profits.⁹⁵ Other federal funding programs such as HOME have set-asides for Community Housing Development Organizations, a specific type of nonprofit developer that has a defined geographic service area and a board with representation of the low-income community it serves.⁹⁶ Georgia's QAP gives additional points to projects supported by community housing teams under the Georgia Initiative for Community Housing.^{97,98} This statewide initiative offers communities a three-year program of collaboration and technical assistance related to housing and community development, so that they can create and launch a locally based plan to meet their housing needs.

One of the most challenging barriers to awarding LIHTC credits to BIPOC-led and community-based development applicants are the requirements that applicants demonstrate prior completed LIHTC projects and a minimum number of years of experience. QAPs can use points to incentivize partnerships between more experienced and less experienced developers that guarantee a minimum equity share. They can also allow alternatives, such as trainings or demonstrated consultant support, to count towards developer experience, and provide financial and technical assistance to BIPOC-led teams to help them compete with more established and capitalized firms. Finally, QAPs can award points for projects that have the option or plans to transfer to tenant ownership when credits are set to expire.

Criteria	Points
2.1. QAP and/or supporting policies include incentives, set asides or threshold requirements for BIPOC-owned or controlled developers and teams, including a definition of BIPOC-owned/controlled entity, and/or developers and teams with demonstration of “lived experience” and local ownership/connection to the community.	1
2.2. QAP and/or supporting policies includes incentives, set asides, or threshold requirements for nonprofit developers beyond the required 10% and/or for Community Development Corporations or Community Housing Development Organizations.	1
2.3. QAPs scoring or requirements for selecting developers allow BIPOC developers eligibility pathways in addition to partnerships (e.g., demonstration of trainings or consultant support) so that newer organizations to LIHTC deals are not excluded by financial strength or experience criteria.	1
2.4. QAP and/or supporting policies provide guidance and support for partnerships and joint ventures with BIPOC-owned/controlled entities, including guarantees to receive a minimum percentage of equity and developer fees, and demonstrate significant role in development decision-making.	1
2.5. QAP and/or supporting policies provide incentives for contracting with BIPOC-owned or controlled service providers (including GC, subcontractors, development team, vendors, supportive services, etc.), including resources to transfer asset management to BIPOC or locally-owned organizations and/or pathways to transition to tenant ownership.	1
2.6. HFAs and states provide technical assistance and financing tools that provide resources to emerging BIPOC developers that enable them to compete with more experienced and capitalized developer teams.	1
Total awardable points for sub-category	6

3. Community Engagement [up to 6 points]

A core tenet of racial equity is ensuring that those closest to the issues are part of identifying and designing the solutions.⁹⁹ Furthermore, racial equity is not only about outcomes, but also about process. The policies and practices below aim to ensure that targeted groups and marginalized populations are part of planning and designing housing that meets their needs.

Washington's bond and tax credit policies award projects points for demonstrating that they are by and for their community, with the goal of serving communities most impacted by housing disparities.¹⁰⁰ The policy recognizes communities both by identity (e.g., BIPOC, disabled) and geography, defines them, and includes CBO participation to measure engagement. Projects may additionally score points for budgeted community engagement resources and showing that the project application responds to community input. The Washington Housing Finance Commission further supplies an Equitable Development Engagement and Community Engagement toolkits to assist project sponsors.^{101,102}

Other examples of community engagement criteria found in QAPs include Minnesota's LIHTC scoring, which adds "equitable development points" for evidence that a qualified stakeholder group that represents the communities most impacted by housing disparities had a significant role in the project proposal.¹⁰³ The Georgia QAP includes points for demonstrating a community partnership of two years or more and having a "Community Quarterback Board" that drives engagement, outreach, and transformation.¹⁰⁴ This board must include representatives of the defined neighborhood who are 80% AMI or less, representatives of local community organizations, and people who can speak to education, transportation, health, local government, and employment issues of the targeted community. Finally, Rhode Island awards points for developers that have demonstrable track record of community engagement and has operated housing in the existing or similar neighborhoods, as well as participation in a public engagement process beyond locally mandated approvals.¹⁰⁵

Criteria	Points
3.1. QAP and/or supporting policies includes definition of community-based organizations and communities impacted by housing disparities.	1
3.2. HFAs or other state housing agencies provide guidance and tools on effective community engagement and partnerships.	1
3.3. QAP and/or supporting policies includes incentives to partner with community-based organizations and communities impacted by housing disparities.	2
3.4. QAP and/or supporting policies requires that applications include demonstration that project design and proposal is responsive to and included input from the communities the project is intended to serve as well including communities impacted by housing disparities.	2
Total awardable points for sub-category	6

4. Amenities and Services [up to 4 points]

Amenities and services connected to housing that serves BIPOC communities can help to improve racial disparities in health, wealth, and other outcomes by offering health and wellness care, asset building support, childcare, recreation, and community. Onsite amenities and services can contribute to resident wellbeing and can contribute to neighborhood assets. In a five-year study, Stewards of Affordable Housing for the Future found that residents in service-enriched housing had higher income, employment rates, and healthcare coverage, among other positive outcomes when compared to families in properties without services.¹⁰⁶

Many QAPs require or incentivize services and amenities, but how they are structured matters. Residents are fully realized and capable individuals who happen to be low-income and/or living with a disability. Many residents desire access to additional services to help them sustain housing stability and help them live more healthful lives and meet their goals. HFAs can require the submission of social

service plans that outline the intended services along with information about service provider's experience serving the intended residents as well as community feedback or evaluations.¹⁰⁷ Mississippi's QAP incentivizes that applicants submit MOUs between the project and a service provider, and Arkansas' QAP requires supportive services for disabled populations that are optional for tenants.^{108,109} In the Connecticut QAP, a project receives additional points for a resident coordinator who helps attract and retain residents from historically marginalized racial and ethnic groups.¹¹⁰

Finally, QAPs can encourage developers to create mechanisms for ongoing feedback and accountability for residents of LIHTC-funded housing units. This can include resident councils, tenant advisory boards, or other group of tenant representatives who can build connection and accountability with building management.^{111,112}

Criteria	Points
4.1. QAP and/or supporting policies include thresholds or incentives for amenities and service coordination (e.g., wellness, childcare, cultural spaces, broadband, economic development, financial services, homeownership counseling, or connecting to community resources).	1
4.2. QAP and/or supporting policies require the submission of Service and Amenity Plans that include evidence of service providers' past experience serving and positive outcomes for the intended tenant population as well as demonstration of input from the intended resident community.	1
4.3. QAP and/or supporting policies include incentives for the provision of, or partnership with agencies to provide voluntary asset building and homeownership services and or plans for tenant or community ownership transition.	1
4.4. HFAs provide guidance and require submission and review of tenant/resident engagement plans and engagement budget in the application.	1
Total awardable points for sub-category	4

5. Location/Siting

An abundance of research shows that neighborhoods matter for the outcomes of communities and that LIHTC developments and units are disproportionately sited in disinvested, low-cost neighborhoods with few resources, contributing to spatial concentration of poverty and potentially reinforcing segregation patterns.¹¹³ As a result, LIHTC projects can increase both the spatial concentration of poverty and racial segregation. This undermines the economic mission of the program, since locating LIHTC projects in disinvested areas increases the rental housing stock in soft markets while failing to increase the supply in tight ones. However, HUD research has found that QAPs can successfully influence LIHTC developments to locate in low-poverty, high opportunity areas.¹¹⁴

Disinvested neighborhoods are also often the location of other disamenities (e.g., brownfields, abandoned properties, polluting industries) that negatively contribute to the outcomes of residents, exposing them to risks and contributing to ever-widening racial health gaps and other negative outcomes. This section is therefore divided into criteria to incentivize the location of LIHTC properties in high resource areas and criteria to disincentivize locating next to known health hazards.

5.1. Location in high opportunity area/proximity to amenities [up to 3 points]

In addition to federally mandated incentives to site LIHTC developments in strong housing markets (Difficult to Develop Areas), many QAPs include incentives to site LIHTC developments in places with access to neighborhood resources (e.g., transit, full service grocery, high quality schools, etc.).¹¹⁵ Definitions of neighborhood-based opportunity and resources, or the ingredients that lead to positive outcomes for residents vary widely, and there is much debate over how to measure opportunity, including critiques over the potential for reverse redlining, the emphasis on mobility and integration over reinvestment in BIPOC neighborhoods, and whether or not locating affordable housing in high resource neighborhoods actually results in greater integration (i.e., if low income BIPOC residents apply for or get into such properties at lower rates than white residents).^{116,117} As a result, LIHTC scoring criteria that aim to reduce racial disparities need to reflect both incentives for locating affordable housing in high resource areas attached to strong affirmative marketing, with comprehensive community development in low resource areas.¹¹⁸

Acknowledging those debates, opportunity should be defined by the target population, and the following general practices are broad enough to encourage the consideration of place, access to resources, and the needs of residents in siting decisions. QAPs can also distinguish between what types of projects are needed in different neighborhoods. In Chicago, for instance, a project in a transitional neighborhood must be part of a revitalization plan, while a project in a gentrifying neighborhood should have more low-income units.

Criteria	Points
5.1.1. QAP and/or supporting policies include set asides, targets, or incentives (points, basis boost, etc.) for developments located in “high resource” or “opportunity areas” allowing for variation by project type (e.g., family vs. rural) and geography (i.e., urban vs. rural), and/or the preferences of the intended tenants (e.g. schools, transportation, presence of community organizations, parks, groceries).	2
5.1.2. HFA provides or links to opportunity mapping or data metrics available statewide.	1
Total awardable points for sub-category	3

5.2. Location and Environmental Health Risks Exposure [up to 3 points]

The LIHTC incentivizes developments in neighborhoods that need reinvestment, called qualified census tracts. Yet, due to our country's history of segregation, environmental racism, and disinvestment, many low-cost parcels are available in locations that may not be suitable for healthful living. Currently, 70% of hazardous waste sites officially listed on the National Priorities List (NPL) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, or "Superfund") are located within one mile of

federally assisted housing.¹¹⁹ HFAs can create policies to both ensure that developers consider nearby risks and reduce current tenants' exposure. The Arkansas QAP, for example, deducts points for locating near an airport, solid waste disposal site, or other use with known health hazards.¹²⁰ If a project is facing closure due to dangerous and hazardous conditions, the Chicago QAP allows consideration of preservation and rehabilitation funding outside of the Competitive Tax Credit round.¹²¹

Criteria	Points
5.2.1. QAP and/or supporting policies require evidence of environmental remediation or future investments (e.g. implementation of revitalization plans), prospects for mixed income housing, and other means of bringing new opportunities when a project is located in a hazardous or disinvested neighborhood with few resources.	1
5.2.2. QAPs and/or supporting policies incentivize investments in rehabilitation and remediation at existing sites with known health hazards to eliminate tenants' exposure, and relocate tenants during rehabilitation if necessary.	1
5.2.3. QAP and/or supporting policies prohibit or include disincentives (e.g. negative points for proximity near land uses that pose environmental health risks (e.g. solid waste disposal, flood zone, etc.)).	1
Total awardable points for sub-category	3

6. Data Accountability and Transparency [up to 3 points]

In order to track success at meeting racial equity outcomes, HFAs and advocates need LIHTC project data reporting, including on tenant demographics, disabled units, and project teams.

Criteria	Points
6.1. QAP and/or supporting policies require tracking and public reporting of vacancies by affordability level and number of disabled people in disabled units.	1
6.2. QAP and/or supporting policies require reporting of tenant demographics.	1
6.3. QAP and/or supporting policies require demographic information on members of project teams.	1
Total awardable points for sub-category	3

Access

[illegible]

Access (Continued)

	Unit Size and Design			Depth of Affordability				Outreach and Affirmative Marketing				Tenant Screening			
	1.1.1	1.1.2	1.1.3	1.2.1	1.2.2	1.2.3	1.2.4	1.3.1	1.3.2	1.3.3	1.3.4	1.4.1	1.4.2	1.4.3	1.4.4
MT		x		x	x										
NC				x											
ND	x	x	x	x	x										
NE	x	x		x	x			x							
NH				x	x										
NJ		x		x	x			x			x				
NM				x	x										
NV				x	x										
NY															
NYC				x	x										
OH		x		x	x							x	x	x	
OK				x	x										
OR	x			x	x			x	x	x	x	x			
PA				x	x										
RI		x		x	x		x	x	x	x	x				
SC				x	x			x							
SD		x			x										
TN				x	x										
TX				x	x										
UT				x	x										
VA		x		x	x										
VT		x		x	x										
WA	x			x	x		x								
WI		x		x											
WV				x											
WY				x	x			x							

BIPOC Developers and Service Providers

	2.1	2.2	2.3	2.4	2.5	2.6
AK						
AL	x					
AR					x	
AZ						
CA	x					
CO						x
CT	x					
DC	x		x			
DE	x	x				
FL						
GA	x			x		
HI						
IA						
ID						
IL	x		x	x	x	x
Chicago	x					
IN	x	x			x	
KS						
KY	x					
LA						
MA	x					
MD	x	x	x			x
ME						
MI						
MN	x					
MO	x		x			x

MS						
MT						
NC		x				
ND						
NE						x
NH						
NJ		x			x	
NM	x					
NV						
NY	x					
NYC						
OH	x	x				
OK	x					
OR	x				x	x
PA	x					
RI					x	
SC						
SD	x					
TN						
TX	x					
UT						
VA	x	x				
VT						
WA			x	x		x
WI	x					
WV	x					
WY	x	x				

Community Engagement

	3.1	3.2	3.3	3.4
AK		x		
AL				
AR				
AZ				
CA				
CO				x
CT	x			
DC				x
DE				
FL				
GA	x	x	x	x
HI				
IA				
ID				
IL	x			x
Chicago				x
IN				
KS			x	
KY				
LA				
MA				
MD	x			
ME				
MI				
MN			x	
MO				
MS				

MT				
NC				
ND				
NE		x		
NH				
NJ				
NM				
NV				
NY				
NYC				
OH				
OK				
OR	x		x	
PA				
RI	x			x
SC				
SD				
TN				
TX		x		x
UT				
VA				
VT				
WA	x	x	x	x
WI				
WV				
WY				

Amenities and Services

	4.1	4.2	4.3	4.4
AK			x	
AL				
AR	x			
AZ			x	
CA	x		x	
CO			x	
CT	x	x		
DC	x		x	
DE	x		x	
FL	x		x	
GA	x			
HI			x	
IA	x			
ID				
IL				
Chicago				
IN	x	x	x	
KS	x		x	
KY				
LA	x			
MA				
MD	x			
ME				
MI				
MN			x	
MO	x		x	
MS	x			

MT			x	
NC	x			
ND	x		x	
NE	x		x	
NH	x			
NJ	x			
NM	x	x		
NV	x			
NY	x			
NYC				
OH	x			x
OK	x		x	
OR				x
PA			x	
RI	x			
SC	x		x	
SD			x	
TN	x		x	
TX				
UT	x		x	
VA	x			
VT	x			
WA	x	x	x	
WI			x	
WV				
WY	x			

Location and Siting

	Location in High Opportunity Areas		Location and Env.t' Health Risks Exposure		
	5.1.1	5.1.2	5.2.1	5.2.2	5.2.3
AK					
AL	x		x		x
AR	x	x	x		x
AZ	x				x
CA	x	x			
CO	x		x	x	x
CT	x	x	x		
DC	x	x	x		
DE	x	x			x
FL	x	x		x	
GA					
HI	x				
IA	x		x		
ID	x				
IL	x	x	x		
Chicago	x				x
IN	x	x	x		x
KS	x	x	x	x	x
KY					
LA	x			x	
MA	x				
MD	x	x		x	
ME	x				
MI	x	x			
MN					
MO	x				
MS	x				
MT	x	x			
NC	x				
ND	x				x
NE	x	x			
NH	x				
NJ	x			x	x
NM	x			x	
NV	x				
NY	x				
NYC					
OH	x	x			x
OK	x				
OR	x	x		x	x
PA	x			x	
RI	x	x			x
SC	x	x			x
SD	x				
TN					
TX	x			x	x
UT	x	x			
VA	x				
VT	x			x	
WA	x	x		x	
WI	x				
WV	x	x			x
WY	x				

Data Accountability and Transparency

	6.1	6.2	6.3				
AK				MT			
AL				NC			
AR				ND		x	
AZ				NE			
CA				NH			
CO	x			NJ			
CT				NM			
DC				NV			
DE				NY			
FL				NYC			
GA				OH			
HI				OK			
IA				OR			x
ID		x		PA			
IL	x			RI			
Chicago				SC			
IN		x		SD			
KS		x		TN			
KY				TX			
LA				UT			
MA				VA			
MD				VT			
ME				WA			
MI				WI			
MN				WV		x	
MO				WY	x		
MS							

Scores may not be entirely accurate being that not all QAP adjacent/accompanying documents may have been identified during the time of the research and comment period.

Endnotes

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3 National Low-Income Housing Coalition, 2022 Annual Report. Available online: https://nlihc.org/sites/default/files/2020_Annual-Report.pdf

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