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NATIONAL LOW INCOME HOUSING COALITION

THE NATIONAL HOUSING TRUST FUND

A SUMMARY OF 2020 STATE PROJECTS

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National Low Income Housing Coalition

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Front Cover Image:

Rehoboth Place II, General occupancy, Gorman & Company, Phoenix, AZ

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INTRODUCTION

This report describes how states awarded their 2020 national Housing Trust Fund (HTF) allocations to projects requesting HTF funds. For 2020, the national HTF allocation was $323 million. The statute creating the HTF requires each state to designate a state entity to administer the state's HTF annual allocation. The U.S. Department of Housing and Urban Development (HUD) calls these entities HTF "state-designated entities" (SDEs). Most SDEs are state housing finance agencies, while some are state departments. After HTF funds became available to states in 2016, National Low Income Housing Coalition (NLIHC) staff established and maintains working relationships with SDE staff.

Jordan Meadows Homes; general occupancy, Jordan Meadows LLC, Dewayne Richardson, Eufaula, AL

The information in this report was provided to NLIHC by SDEs. It is not meant to be "official" information of the kind ultimately presented by SDEs to HUD's Office of Community Planning and Development (CPD) through CPD's Integrated Disbursement and Information System (IDIS). The information an SDE provides to NLIHC generally represents the number of HTF-assisted units a developer anticipated a project would have at the time an HTF application was awarded. Some information – such as the number of HTF-assisted units or the amount of HTF money awarded – might change over time. Likewise, some projects might be cancelled and replaced with new projects. Because official project data, such as HTF-assisted units, is reported by SDEs to CPD several years after an HTF award is made due to the lengthy nature of the housing financing and construction processes, NLIHC's purpose in gathering this information before project completion is to obtain a preliminary understanding of the number, type, and nature of HTF-assisted projects and units so that our organization can better support the HTF. In addition, NLIHC asks for more information than is required by CPD for publication of the office's HTF National Production Reports (HUD stopped posting HTF National Production Reports under the Trump Administration.)

Starting in 2000, NLIHC played an essential role in advocating for the creation of the HTF. Therefore, NLIHC has a strong interest in the success of the program, particularly in these early years of its implementation. To that end, NLIHC staff contacted SDEs to obtain information about projects awarded 2020 HTF funds and asked those SDEs to submit responses to a standard list of questions designed to obtain information about basic project characteristics. While most SDEs provided all or a significant portion of the requested information, some only provided rudimentary information. In all cases, NLIHC staff conduct additional digital searches to supplement information provided by SDEs to NLIHC.

In September 2018, NLIHC published a preliminary report examining the 2016 HTF awards, *Getting Started: First Homes Being Built with National Housing Trust Fund Awards*, later supplementing the report with additional data as more states provided the necessary information ("Supplemental Update to *Getting Started*"). Subsequently, NLIHC published *The National Housing Trust Fund: An Overview of 2017 State Projects* in September 2022, *The National Housing Trust Fund: A Summary of 2018 State Projects* in October 2022, and *The National Housing Trust Fund: A Summary of 2019 State Projects* in January 2025, addressing how states proposed awarding their 2017, 2018, and 2019 HTF allocations, respectively.

Oakleigh Crossing, general occupancy, Resource Housing Group, Inc, Alexander City, AL

Oakleigh Crossing, general occupancy, Resource Housing Group, Inc, Alexander City, AL

BACKGROUND

The national Housing Trust Fund (HTF) is a relatively new federal program that provides block grants to states to build, preserve, or rehabilitate housing affordable to extremely low-income households – those with income at or less than 30% of the area median income (AMI), or at or less than the federal poverty line (whichever is greater, according to the interim regulations). NLIHC interprets the statute authorizing the HTF to require 90% of any funds awarded to a state to be used for rental housing; however, CPD interprets the percentage to be 80%. The amount of HTF resources awarded to a state is determined by a formula established in statute. The formula is based principally on the shortage of rental homes affordable and available to extremely low-income renter households and the extent to which such households are spending more than half their income on rent and utilities. The second Trump Administration drastically reduced information on the HUD website and as of the date of this report, only a very brief description of the HTF is available on the HUD website (select "Community Planning and Development" in the left column). Additional HTF information can be found on the separate HUD Exchange website, although it is frozen in time as of the end of 2024.

Atsaq Place, PSH chronically homeless, Bethel Community Services Foundation
Bethel, AK, Photo: Gabby Hiestand Salgado/KYUK

Ch'bala Corners Phase I, Of 48 units, 21 for seniors, 14 for people with disabilities and 7 for homeless, Cook Inlet Housing Authority, Anchorage, AK
Photo: Ken Graham Photography

HomePlate Apartments, PSH chronically homeless, Nome Community Center
Nome, AK

In 2020, there was a national shortage of 7 million rental homes affordable and available to extremely low-income households. Another way of expressing this national gap is that for every 100 extremely low-income renter households, there were only 36 affordable and available apartments. In 2025, NLIHC's *Gap Report* indicates that there is a national shortage of 7.1 million rental homes affordable and available to extremely low-income households, or only 35 affordable and available apartments for every 100 extremely low-income renter households.

The HTF was authorized by the "Housing and Economic Recovery Act of 2008" on July 30, 2008, but HTF resources did not become available to states until May 2016. The delay in implementation was due to the financial crisis in the fall of 2008, during which then-Director of the Federal Housing Finance Agency (FHFA) Ed DeMarco suspended the 4.2 basis point (0.042%) assessments on "new business" that Fannie Mae and Freddie Mac (the Government-Sponsored Enterprises, GSEs or Enterprises) were to use to generate funding for the HTF. The new business of the GSEs refers to the unpaid principal balance of their total new business purchases, which are the single- and multi-family residential mortgage loans or re-financings acquired by the GSEs and held in portfolio or that support securities, notes, or other obligations that the GSEs guarantee. In December 2014, the new FHFA Director, Mel Watt, concluded that Fannie Mae and Freddie Mac were in stable financial condition and lifted the suspension on the 4.2 basis point assessments, directing the Enterprises to begin applying the assessments starting January 1, 2015. Therefore, 2016 was the inaugural year of HTF implementation.

At the end of each calendar year, the Enterprises are given 60 days to determine the amount of money collected for the HTF and forward that amount to HUD. HUD then applies the statutory formula (refined by the interim HTF regulations) to determine the amount of HTF funds that will be allocated to each state and publishes those amounts in the *Federal Register*. The statute also requires that each state and the District of Columbia receive a minimum of $3 million in HTF funds. Given the relatively small amount of money collected for the HTF in 2020 – $323 million – 22 states and DC received the $3 million minimum allocation. From 2016, the amount of money collected for the HTF grew from $174 million in 2016 to $219 million in 2017 and $267 million in 2018, with a dip to $248 million in 2019. The HTF allocation then began growing again with $323 million in 2020, $690 million in 2021, and $740 million in 2022. Then, due to high interest rates and the consequent decline in new home purchases and existing home refinancing, the amount of money collected for the HTF dropped to $382 million in 2023 and $214 million in 2024, then rose slightly in 2025 to $223 million.

Willow Green, people with disabilities at 2 of 8 units, Kenai Peninsula Housing Initiatives, Soldotna, AK

The authorizing statute requires each state to develop a draft annual HTF Allocation Plan and seek public input before submitting a final Allocation Plan to HUD for approval. During the first two years of HTF implementation, HUD headquarters staff were involved in reviewing and approving Allocation Plans in order to ensure that inaugural plans complied with the law and regulations, thereby establishing reliable standards for future HTF Allocation Plans. States cannot publish requests for proposals (RFPs) or Notices of Fund Availability (NOFAs) until their HTF Allocation Plans are approved by their respective CPD Field Office.

Casa Del Sol II, 52 units set aside for seniors, Walling Affordable Housing Communities LP, Sierra Vista, AZ

QUALITATIVE ANALYSIS OF STATES' 2019 NATIONAL HOUSING TRUST FUND ANNUAL ALLOCATION PLANS AND 2024 WEBSITES

2019 HTF Allocation Plans

HTF Allocation Plans are incorporated into each SDE's Annual Action Plan, which is part of their Consolidated Plan obligations. The HTF Allocation Plan must describe how a state will distribute its HTF funds, including how it will use the funds to address its priority housing needs, the criteria a state will use to select projects to fund, as well as other factors. NLIHC maintains that an HTF Allocation Plan should be easy for the general public to read and that it should provide detailed information about a state's priorities for helping to provide affordable housing to extremely low-income renters, especially regarding whether the state plans to target its limited HTF resources to certain special needs populations.

Rehoboth Place II, general occupancy, Gorman & Company, Phoenix, AZ

NLIHC's 2019 HTF report provided a qualitative assessment of the extent to which a state's HTF Allocation Plan was informative to a non-developer, general public reader. NLIHC assessed whether and how clearly an HTF Allocation Plan provided information about a state's priorities for serving specific populations to be housed at HTF-assisted units (such as people experiencing homelessness and people with disabilities), the type of projects to be assisted (such as new construction, preservation, or adaptive reuse), and other "merits" of a project as called for by the statute and regulations. NLIHC did not repeat such an assessment for this 2020 HTF report, assuming that during the 2020 pandemic year, major changes were not undertaken as SDEs shifted staff to designing and implementing temporary federal and state programs to address the housing impacts of the pandemic. NLIHC did observe slight differences between 2019 and 2020 HTF Allocation Plans but did not undertake a qualitative assessment similar to that carried out for the 2019 HTF report. NLIHC also recognizes that states might have made improvements to their HTF Allocation Plans and supporting materials since 2020; nonetheless this report reiterates the 2019 qualitative assessment assuming that most SDEs have not made significant improvements to date.

Crossroads Village, PSH chronically homeless, Adaptive reuse, RH Community Builders and UPholdings, Fresno, CA

NLIHC provided eight states an "A" grade and 12 states a "B" grade. Unfortunately, 20 states and subrecipients were assigned a "C," while eight states and subrecipients received a "D" and three received an "F." Appendix B provides detailed explanations regarding the letter grades. In general, most HTF Allocation Plans were written for potential developer HTF fund applicants. NLIHC acknowledges that the reason so many states do not provide informative, easy-to-read HTF Allocation Plans is probably due to a template issued by CPD that states can use to submit their HTF Allocation Plans to CPD for their Consolidated Plan Annual Action Plans.

2024 State Websites

The 2019 HTF report also provided a qualitative assessment of each state's 2024 website. For residents to be effective advocates regarding how their state uses the HTF, residents must be aware that the HTF exists, have basic knowledge about the program, and know how their state administers it – particularly regarding their state's priority allocation factors. To this end, NLIHC reviewed each state SDE's 2024 website to discern how readily someone might be able to find information about the HTF in their state, as well as the comprehensiveness and clarity of that information.

Eighteen states and two state subrecipients did not include even one hyperlink to their HTF program on their websites. In the cases of three other states, a reader had to navigate several layers of webpages to find an HTF hyperlink. Finding a working HTF hyperlink is just one challenge – linked pages must also contain adequate information to be helpful to readers. Yet finding information about the HTF and in some instances any reference to the HTF – was often difficult, requiring a reader to navigate extensively through a website and guess about which linked pages might include information about the HTF.

NLIHC's qualitative review of state SDE websites sought to learn whether an HTF link existed or was easy to find, whether a basic HTF description existed, whether other helpful information existed (such as HTF-related RFPs/NOFAs, application guides, and scoring sheets), and whether any of the information was informative to a general, non-developer reader. NLIHC also observed whether a state SDE website had a current HTF Allocation Plan as well as past HTF Allocation Plans. In general, NLIHC found that the information provided by SDEs was written with developers as the target audience, not the general public or advocates seeking to influence the type of development or the population type to be housed with HTF assistance.

NLIHC assigned a letter grade of "A" to seven states and two subrecipients, "B" to four states, "C" to eight states, "D" to 13 states and two subrecipients, and "F" to 19 states and one subrecipient. Detailed explanations are presented in Appendix C. Clearly, more states need to improve their websites so that the general public can be aware of and well-informed about the HTF and how their state plans to and has used the HTF.

The Phoenix, PSH people with disabilities, East Bay Asian Development, Oakland, CA

Pimental Place, PSH 15 units for homeless, EAH Housing, Hayward, CA

SYNCHRONIZING THE HOUSING TRUST FUND PROCESS WITH OTHER STATE RESOURCE ALLOCATION CYCLES

South Park Commons, PSH chronically homeless, Abode Services/Allied Housing
Santa Rosa, CA

Although it is a valuable resource, to date the HTF is still a very modest one. At the same time, many states have long-standing processes for awarding resources to affordable housing projects from other programs. Because many of these programs – which include the Low-Income Housing Tax Credit (LIHTC) program, the federal HOME Investment Partnerships (HOME) program, state housing trust funds, and other state-specific programs – have long-established application cycles, states often choose to synchronize the process of awarding HTF money with existing application and award cycles. States primarily choose to synchronize the HTF award process with LIHTC cycles, but they also occasionally synchronize the process with cycles previously established for HOME, state-specific programs, state HTFs, or awards targeted to special needs projects.

A review of state 2020 HTF Allocation Plan and/or application materials[1] shows that 30 states have annual application cycles, some of which indicate that if there are an insufficient number of applications or of applications that meet a state's threshold requirements, subsequent opportunities to apply will be provided. Four more states have annual cycles but explicitly anticipate holding subsequent application rounds. Three states have semi-annual cycles, one has a quarterly cycle, two have monthly cycles, eight accept applications on a rolling basis, and four more have unspecified multiple opportunities to apply for HTF funds.

[1]Some states' 2020 HTF Allocation Plans or application materials do not provide sufficient information to determine the frequency or type of application cycles.

Twenty-three states enmeshed the HTF application process with their existing LIHTC cycle in some fashion; all these processes included the HOME program and/or state programs as well as the LIHTC program. In three of those states, applicants completed a general application without requesting funds from a specific source, and the SDE determined the available funding source most appropriate for a project. Of these 23 states, eleven offered multiple options – including a LIHTC option – from which an HTF applicant could choose, while twelve states tied HTF applications to the LIHTC program only.

Seventeen states had an HTF-specific application, although eight of these states indicated that an applicant could also seek HTF funds through HOME, a state program, or the LIHTC program via separate applications. In addition, three states' application processes involved a single application tied to non-LIHTC programs such as HOME, a state housing trust fund, or other state housing programs.

Anticipating a future in which the HTF might have more substantial resources, the current, interim HTF regulations allow states to designate a unit of local government as a "subgrantee" to administer all or a portion of a state's HTF allocation. Subgrantees must have their own HTF Allocation Plans. Given the modest amount of HTF allocated to date, only two states chose to use subgrantees. Alaska provided $550,000 of its $3 million HTF allocation to Anchorage as a subgrantee. (Anchorage is also a HOME Program Participating Jurisdiction.) Hawai'i established four subgrantees, suballocating 50% of its $3 million HTF allocation to the City and County of Honolulu and – in imitation of the allocation process for the state's HOME program – suballocating the other 50% of its HTF allocation to Hawai'i, Kaua'i, or Maui counties on a rotating basis that changes annually.

Umeya, PSH, 87 units for homeless, Little Tokyo Service Center Community, Development Corp., Los Angeles, CA

OVERVIEW OF FINDINGS

HOUSING TRUST FUND AWARDS BY STATE IN 2020

Out of $323 million available, 50 states and the District of Columbia awarded HTF assistance to 216 projects with 1,625 HTF-assisted units using their 2020 HTF allocations. Many of these projects also received HTF funds from previous and/or subsequent HTF allocations. A total of 2,148 units were HTF-assisted, considering funds from previous and/or subsequent HTF allocation years in these projects.

STATE	PROJECTS	2020 UNITS	ALL YEARS UNITS
Alabama	3	17	17
Alaska	5	10	17
Arizona	3	23	23
Arkansas	2	19	22
California	6	201	235
Colorado	3	`9	19
Connecticut	3	32	41
Delaware	6	15	38
District of Columbia	1	17	17
Florida	11	45	53
Georgia	5	28	87
Hawaii	2	12	14
Idaho	3	12	12
Illinois	4	51	66
Indiana	7	58	137
Iowa	1	14	14
Kansas	5	15	15
Kentucky	1	23	23
Louisiana	3	9	34
Maine	3	21	21
Maryland	3	24	24
Massachusetts	4	60	60
Michigan	3	69	85
Minnesota	2	25	31
Mississippi	2	42	42
Missouri	5	29	43

For projects with HTF from multiple years, NLIHC has prorated the number of 2020 HTF-assisted units reported on this chart.

The information in this report was provided to NLIHC by each State Designated Entity (SDE). It is not meant to be “official” information that the state will ultimately present to HUD through IDIS. Some features, such as number of HTF-assisted units, amount of HTF awarded, etc. might change; some projects might be dropped and new ones substituted. The purpose of gathering this information is to obtain a preliminary sense of the number, type, and nature of HTF-assisted projects and units so that NLIHC can better support the HTF. Also, NLIHC asks for more information than HUD requires for its HTF National Production Reports.

STATE	PROJECTS	2020 UNITS	ALL YEARS UNITS
Montana	7	27	83
Nebraska	2	17	23
Nevada	3	25	27
New Hampshire	3	15	23
New Jersey	9	25	25
New Mexico	5	18	18
New York	16	80	80
North Carolina	9	30	92
North Dakota	2	35	35
Ohio	4	62	12
Oklahoma	1	12	16
Oregon	4	16	40
Pennsylvania	8	40	24
Rhode Island	3	13	14
South Carolina	2	12	16
South Dakota	3	16	87
Tennessee	4	42	74
Texas	5	71	24
Utah	5	21	23
Vermont	6	18	50
Virginia	8	50	22
Washington	3	14	24
West Virginia	1	23	23
Wisconsin	4	28	40
Wyoming	2	25	25

TOTAL: 216 projects with 1,625 units assisted with 2020 HTF funds, total of 2,148 units assisted with HTF funds from other allocation years

HTF RESOURCES TARGETED TO SPECIAL NEEDS POPULATIONS

As in previous years, states utilized most of their HTF resources in 2020 to target projects that will serve people experiencing homelessness, people with disabilities, seniors, or other special needs populations. For example, states report the following information:

- **Homelessness.** Fifty-seven projects that received HTF funds in 25 states planned to serve homeless households in 1,907 units. Of these 1,907 homeless units, 1,060 units were in properties totally devoted to providing housing to people experiencing homelessness, while 847 units were set aside for people experiencing homelessness among a project's total units. Of the 1,907 homeless units, 726 were directly assisted with HTF funds from any HTF allocation year. Of these 726 HTF-assisted units, 193 were assisted from 2020 HTF funds (reflecting NLIHC's decision to report based on the ratio of 2020 HTF funds in a project to total HTF funds from previous and/or future years). States awarded $102,877,097 in 2020 HTF funds (29% of all 2020 HTF awards) to the 57 projects planned to serve people experiencing homelessness. In addition to 2020 HTF funds, 29 of the 57 projects received HTF funds from previous and/or subsequent HTF allocation years, amounting to a total of $150,012,195 to the 57 projects. (More details are available on page 29) .
- **People with Disabilities.** Thirty-seven projects that received HTF funds in 22 states planned to serve people with disabilities in 595 units. Of these 595 units for people with disabilities, 204 were in properties totally devoted to providing housing to people with disabilities, while 301 units set aside for people with disabilities were among a project's total units. Of the 595 units for people with disabilities, 285 were directly assisted with HTF funds from any HTF allocation year. Of these 285 HTF-assisted units, 248 were assisted from 2020 HTF funds (reflecting NLIHC's decision to report based on the ratio of 2020 HTF funds in a project to total HTF funds from previous and/or future years). States awarded $49,851,141 in 2020 HTF funds (14% of all 2020 HTF awards) to the 37 projects providing units for people with disabilities. In addition to 2020 HTF funds, 15 of the 37 projects received HTF funds from previous and/or subsequent HTF allocation years, amounting to a total of $62,096,300. (More details are available on page 30).

AVi at Olde Town, 30 units for youth aging out of foster care, 9 units for homeless, veterans, Foothills Regional Housing, Arvada, CO

Clara Brown Commons, general occupancy, Mile High Ministries, Denver, CO

The Iron Horse, general occupancy, Northwest Real Estate Capital Corp., Alamosa, CO

- **Seniors.** Fifty-two projects that received HTF funds in 25 states planned to serve seniors in 3,309 units. Of these 3,309 senior units, 3,031 were in properties totally devoted to providing housing for seniors, while 275 senior units were mingled among a project's non-senior units. Of the 3,309 senior units, 534 were directly assisted with HTF funds from any HTF allocation year. Of these 534 HTF-assisted units, 381 were assisted from 2020 HTF funds (reflecting NLIHC's decision to report based on the ratio of 2020 HTF funds in a project to total HTF funds from previous and/or future years). States awarded $55,781,141 in 2020 HTF funds (16% of all 2020 HTF awards) to the 52 projects. In addition to 2020 HTF funds, 20 of the 52 projects received HTF funds from previous and/or subsequent HTF allocation years, amounting to a total of $78,796,742. (More details are available on page 31).

Hernan's Haven for Youth, PSH homeless youth, Alpha Community Services YMCA Bridgeport, CT

- **Mixed Special Needs.** Thirteen projects assisted with HTF funds in eight states planned to target 211 units for an unspecified mix of special needs populations without being limited to one type of special needs population, such as homeless, disabled, or elderly populations. Of the 211 units, 46 were planned to be assisted with 2020 HTF funds. Six of the 13 projects also received HTF funds from previous and/or subsequent HTF allocation years; adding units assisted with those years' funds, the 13 projects had a total of 152 HTF-assisted units. States awarded $9,318,928 in 2020 HTF funds (2% of all 2020 awards) to the 13 projects. Including previous and/or subsequent HTF allocation years' funds, states awarded a total of $13,315,053 to the 13 projects. (More details are available on page 32).

- **Other Special Needs.** Sixteen states reported 24 projects serving a variety of other special needs populations assisted with 2020 HTF funds. The other special needs included: veterans, youth aging out of foster care, domestic violence survivors, people with substance abuse issues, and HIV-affected families. Those 24 projects planned to serve other special needs populations in 240 units. It is not possible to determine how many of the 240 units were actually assisted with 2020 HTF funds because in 10 projects, other special needs (such as homelessness) were among units that comprised a larger percentage of total units and/or exceeded the number of declared HTF-assisted units. For the remaining 14 projects, 95 units were supported with 2020 HTF funds using $17,020,591 (5% of all 2020 awards). (More details are available on page 32).

Solomon's Court I and II, general occupancy, Be Ready Community Development Corp. Wilmington, DE

Durham Place, Homeless, Wendover Housing Partners, Orlando, FL

Fulham Terrace, PSH seniors, 14 units special needs, 7 units veterans, Wendover Group Riverview, FL

Independence Landing, Intellectually and developmentally disabled adults, Independence Landing, Tallahassee, FL

Lakewood Christian Manor, seniors, National Church Residences, Atlanta, GA

- **Permanent Supportive Housing.** Because some states' replies to NLIHC's request for project-specific information were minimal, NLIHC is not confident that all SDEs indicated whether a project entailed permanent supportive housing (PSH). Nonetheless, 24 states did indicate 64 projects were assisted with 2020 HTF funds. These 64 projects contained 2008 PSH units, of which 1,490 units provided PSH for people experiencing homelessness. 2020 HTF assistance was provided to 608 units, with 783 units assisted by previous or subsequent years' HTF allocations.

- **General Occupancy/Family.** Thirty-nine states reported 102 projects (53% of the projects in the "family" category) that had units not targeted to a special needs population, but that did meet an important need – units with three or more bedroom units, a unit size needed by larger families (more details are available on page 34). Of the 102 projects, SDEs identified 72 projects as entirely "family" or "general occupancy," or the SDEs did not indicate any specific population category (which NLIHC assumes are family/general occupancy because additional research did not suggest otherwise). The other 30 projects had some mix of general occupancy and special needs population. The 102 projects had a total of 7,982 units, with 7,251 units designated as "family," with 435 units assisted with 2020 HTF funds. Twenty of the projects also received HTF funds from previous and/or subsequent HTF allocation years; adding units assisted with those years' funds, the 20 projects had a total of 540 HTF-assisted units. States awarded $119,712,476 in 2020 HTF funds (34% of all 2020 awards) to the 102 projects. Including previous and/or subsequent HTF allocation years' funds, states awarded a total of $162,768,396 to the 102 projects planned for general occupancy.

Note that the HTF-assisted unit numbers and HTF allocations sometimes reflect "double counting" because projects might serve people with dual characteristics, such as homeless youth exiting foster care, homeless persons with serious mental illness, or elderly people with physical disabilities. See "Targeted Populations" on page 28.

POLICIES TARGETED TO EXTREMELY LOW-INCOME RENTERS

The HTF statute requires at least 75% of a state's allocation to benefit extremely low-income (ELI) households - those with income equal to or less than the federal poverty line or 30% of the area median income (AMI), whichever is greater. Not more than 25% of a state's HTF allocation can benefit households with income at or less than 50% AMI ("very low-income" households). The HTF interim regulations provide that whenever there is less than $1 billion transferred from the GSEs to HUD, 100% of a state's HTF allocation must be used for homes occupied by ELI households. To date, all annual HTF allocations have been less than $1 billion.

McAuley Station, 30 PSH units for people with mental illness, St. Joseph's System and Pennrose LLC, Atlanta, GA

Seven states have policies affecting the number of ELI units in a project:

Colorado notes in its funding application that due to the strong demand for housing affordable to ELI households, the state will subsidize rental projects incorporating a minimum of 5% of a project's total units that are restricted to households with income equal to or less than 30% of AMI. The state encourages applicants to provide a greater percentage. Colorado's HTF Allocation Plan provides a secondary funding priority to mixed-income projects that, in the absence of HTF funding, could not financially accommodate units affordable to households with income equal to or less than 30% AMI.

Kaiāulu O Halele`a, General occupancy, Ikaika Ohana, Kihei, Maui, HI

Florida's HTF Allocation Plan states that it will give "preference" to projects that propose to provide units for households with income at or less than 22% AMI in order to serve those with income at or near the Supplemental Security Income (SSI) level who have special needs and/or are experiencing homelessness. That same page of the HTF Allocation Plan also states that Florida will "prioritize" HTF fund use for developments that commit to integrate in a development, a small number of HTF-assisted units serving people experiencing homelessness or people with other special needs.

To implement these preferences/priorities, Florida offers developers a range of Requests for Applications (RFAs) each year, often between 15 and 18 RFAs, each with slightly different targeting requirements. Six of Florida's 11 projects reflected in this report were based on RFA 2020-205 from 2020 or RFA 2019-116 from 2019, which in general start out requiring 15% of the total units to be set aside as "ELI Set-Aside Units" restricted to households with income at or less than 30% AMI. If developers request an HTF forgivable loan, the project must set aside an additional five units (in large counties)/three units (in medium counties) at 22% AMI as Link Units for Persons with Special Needs who are referred by designated Special Needs Household Referral Agencies.

Illinois uses its Permanent Supportive Housing Development Program RFA to award HTF funds. All projects awarded funds through this program, including HTF-assisted projects, must have a minimum of 50% of all units affordable to households with income at or less than 30% AMI. Illinois encourages project developers to exceed the 50% minimum.

Pomerelle Pointe Apartments, General occupancy, Pacific West Communities
Burley, ID

North Carolina requires projects seeking HTF as well as LIHTC to target at least 25% of the total LIHTC units for ELI households.

Ohio has a threshold requiring 10% of a project's units to be rent-restricted units at 30% of 30% AMI or five units at 30% of 30% AMI, whichever is greater.

Pennsylvania requires that at least 10% of all units in urban areas and 5% of all units in suburban or rural areas be affordable to households with income equal to or less than 20% AMI.

South Carolina requires all projects with six or more units to have at least 25% of assisted units to be assisted with HTF.

Ten states can award competitive points to projects that propose to provide a certain percentage of ELI-targeted units. These states assign points to a variety of an applicant's project characteristics. Applicants often have to achieve a minimum total point score and applications with the higher number of total points are awarded HTF funds.

Anchorage (the Alaska subgrantee) can provide five points (out of 150) based on the percentage of units targeted to ELI households.

California offers (unspecified) "full points" if a project's rents are set at 30% of a household's actual income.

Access Health & Housing, PSH people with disabilities, Home First, Maywood, IL

Access Health & Housing, PSH people with disabilities, Home First, Maywood, IL

Connecticut prioritizes projects that preserve or increase affordable housing for ELI households. The state can provide eight points (out of 120) if 15%-20% of a project's units are targeted to ELI households, five points if 10%-15% are ELI, and three points if 5%-10% are targeted to ELI households. The state subtracts five points for projects that propose 30% or more ELI-targeted units.

Indiana can provide 16 points (out of 148) if 25% of a project's units are targeted to ELI households and 25% of the units are targeted to households with income equal to or less than 50% AMI (very low-income or VLI), 12 points if 25% of the units are ELI and 15% are VLI, eight points if 25% are ELI, and four points if less than 25% units are ELI and 33% are VLI (including the ELI units).

Minnesota can provide seven points (out of 286) if 30%-40% of a project's units are targeted to ELI households, six points if 20%-30% are ELI targeted, five points if 10%-20% are ELI targeted, and four points if 5%-10% are targeted to ELI households.

New Hampshire can provide five points (out of 230) if 10% or more of a 9% LIHTC project's units are targeted to ELI households. (New Hampshire also sets aside nearly half of its HTF allocation for a separate RFP for projects serving households experiencing homelessness).

New Mexico can provide new construction projects one point for every one new ELI unit for every three market-rate units, up to 10 points (out of 115). For adaptive reuse of a hotel/motel, New Mexico can provide ten points for creating 30 units consisting of 10 ELI, 10 VLI, and 10 market-rate units.

North Dakota can award 50 points (out of 168) if 35% of a project's units are targeted to ELI households, 40 points if 30% are ELI, 30 points if 25% are ELI, and 20 points if 20% are ELI.

Utah can award 10 base points (out of an unknown total) for each ELI unit, up to 20 units. In addition, for 9% LIHTC projects, Utah can award five additional points for each unit targeted to households with income at or less than 20% AMI, and 10 additional points for each unit targeted to households with income at or less than 15% AMI. For all other projects, Utah can award five additional points for each unit targeted to households at or less than 30% AMI, 10 points for units at or less than 25% AMI, 15 points for units at or less than 20% AMI, and 20 points for units at or less than 15% AMI.

Wyoming can award up to 36 points (out of 494) based on the percentage of units that are rent restricted to 30% AMI.

Conservatory Apartments, PSH homeless women, Interfaith Housing Development Corporation, Deborah's Place, Chicago, IL

POLICIES TARGETING LARGE FAMILY UNITS

It is especially difficult to find affordable homes for large families who need more than two bedrooms. Six states' HTF Allocation Plans or RFPs/NOFAs provided competitive points for applications proposing units with more than two bedrooms.

- **Alaska** claims larger family units are a priority but will only award two points (out of 236) based on the percentage of units with three or more bedrooms.
- **Connecticut** can award points for projects that create or preserve units with two or more bedrooms in municipalities that have an affordable housing stock of less than 10%; two points can be awarded for every four units of non-age-restricted housing created or preserved – up to a total of 15 points (out of an unknown possible number of points).
- **Kansas** can provide one point for each 2% of three-bedroom units as a percentage of total units up to a maximum of 10 points (out of 310).
- **North Dakota** can award 10 points (out of 168) to projects if 20% or more of the HTF-assisted units have three or more bedrooms, plus up to three points can be awarded for each Universal Design unit with two or more units.
- **Pennsylvania** can award 10 points (out of 204) if 25% or more of the units in urban areas have three or more bedrooms or 20% or more in suburban or rural areas, eight points if between 20% to 24% are large units in urban areas or 15% to 10% are large units in suburban or rural areas, and six points if large units comprise 15% to 19% of units in urban areas or 10% to 14% are large units in suburban or rural areas.
- **Wisconsin** can offer four points (out of 233) if a project is targeted to households with children. This topic is discussed further in the "Targeted Populations" section on page 34.

Englewood Family Housing, PSH for HIV-affected families, Chicago House, Chicago, IL


Hanna Commons, PSH homeless, UPholdings and Southeast Neighborhood Development, Indianapolis, IN

POLICIES LIMITING ACCESS TO NONPROFITS OR PROVIDING POINTS FOR NONPROFITS

Five states have policies that will only award HTF funds to applications from nonprofit organizations: Delaware, Maine, Massachusetts, Tennessee, and Washington. (Tennessee and Washington include public housing agencies, and Washington includes Tribally Designated Housing Entities). Maine and Massachusetts explicitly state that in LIHTC situations, a for-profit must partner with a nonprofit.

Another five states can award points for nonprofit developers: the District of Columbia offers five points (out of 200), Idaho offers two points (out of 115) or four points to HOME program Community Housing Development Organizations (CHDOs), Iowa offers five points (out of 76), New Jersey offers two points (out of 100), and New Mexico offers five points (out of 115) for applications submitted by nonprofits, Tribally Designated Housing Entities, or PHAs.

Mullen Flats, PSH homeless, Mental Health America of West Central Indiana
Terre Haught, IN

HOUSING TRUST FUND RESOURCES USED IN CONJUNCTION WITH OTHER RESOURCES

Although not essential, knowing how HTF is used in conjunction with other major sources of project financing is informative. NLIHC has not received complete information from all states about other funding sources in projects that also received HTF funds, in part because of the extra time necessary for busy SDE staff to compile this information.

However, the Low Income Housing Tax Credit (LIHTC) was a key financing component of 167 projects assisted with 2020 HTF funds in 46 states, while 46 other projects in 23 states did not use LIHTC. The HOME program contributed gap financing in 95 projects in 37 states, while the Federal Home Loan Banks' Affordable Housing Program (AHP) provided gap financing for 38 projects in 24 states. Resources from state or local housing trust funds were used in 64 projects in 25 states, while other state or local programs were used in 110 projects in 38 states. Nine other federal programs assisted 36 projects. This topic is discussed further in "Other Resources in Housing Trust Fund-Assisted Projects" on page 50.

TYPES OF PROJECTS

Small-Scale Projects

Seven states have policies oriented to small-scale projects and one state can offer points.

- **Illinois** has had a policy of limiting HTF awards to permanent supportive housing projects with 25 or fewer units, which the SDE indicated were not conducive to LIHTC funding; Illinois raised the cap for 2020 to 40 units.
- **Iowa** does not have a stated policy regarding smaller projects; however, since the inception of the HTF program in 2016, Iowa has consistently awarded its entire HTF allocation to a single permanent supportive housing project with 21 to 36 units.
- **Nebraska** sets aside a portion of its HTF allocation (about 25% in past years) for smaller scale projects that will not have LIHTC financing (the maximum number of units is not indicated). Nebraska calls this the "Targeted Needs Set-Aside."
- **New Jersey** limits HTF awards to projects with four or fewer units.
- **Ohio** offers two application options, one of which is targeted to projects that do not seek LIHTC funds and that will have 24 or fewer units.

Saint Katarina Kasper Serenity Place, PSH homeless, Bradley Company, Plymouth, IN

- **South Carolina** devoted its HTF allocation to the state's Small Rental Development Program (SRDP) for new construction of properties with no more than 32 units, at least 25% of which must be HTF-assisted. For 2020, South Carolina set aside only 35% of its annual HTF allocation for SRDP and established two components: General New Construction for projects having up to 39 affordable units (it is not clear if there is an HTF minimum), and Micro New Construction for projects created by nonprofits with no more than eight affordable units.
- **South Dakota** can award 10 points (out of 940) to properties with 16 units or less.

Rural Projects

Ten states' HTF Allocation Plans or RFPs/NOFAs had provisions pertaining to rural projects.

- **California** set aside 20% of its HTF allocation for rural projects.
- **Colorado** placed rural projects in a fifth-level priority out of five priority levels; last year it was a third-level priority.
- **Louisiana** indicated a "preference" for rural projects.
- **Nebraska** set aside a portion of its annual HTF allocation for projects that also use LIHTC; half of this set-aside is targeted to rural areas. In addition, Nebraska offers three points (out of 70) for projects in an area with a population less than 5,000, and two points in an area with a population between 5,000 and 15,000.
- **Pennsylvania** aims to allocate half of its annual HTF allocation to suburban or rural areas.
- **Wisconsin's** HTF Allocation Plan indicates the state has a "preference" for rural projects in areas that have not recently had an LIHTC project; elsewhere the HTF Allocation Plan states that rural projects are a "priority." Wisconsin also awards rural projects five points (out of 100).
- Four additional states award points for rural projects: **Alabama** (ten points out of 105), **Alaska** (20 "small community" points out of 236), **Tennessee** (seven points out of 100) plus an additional three points if the developer is a rural PHA, and **Utah** (two points out of an unknown total).

Homestead Senior Residences at Bel Aire, Seniors, Homestead Affordable Housing Inc. (CHDO), Bel Aire, KS

Homestead Senior Residences at Bel Aire, seniors, Homestead Affordable Housing Inc. (CHDO), Bel Aire, KS

Although NLIHC is not confident that all states reported which of their projects were in rural areas, 22 states reported 38 projects in rural areas receiving $36,105,576 in 2020 HTF funds ($42,105,576 in total HTF funds from previous and/or subsequent years' allocations). These projects contained 1,782 units (194 HTF-assisted units with 2020 HTF funds, and 263 HTF-assisted units if not prorated to reflect HTF from other years' allocations).

New Construction, Adaptive Reuse, Preservation, Rehabilitation Creating New Units, Rehabilitation Only

The statute creating the HTF states that "[t]he purpose of the Housing Trust Fund…is to provide grants to States for use to increase and preserve the supply of rental housing for extremely low-income and very low-income families, including homeless families." Regarding rental housing, the statute states that HTF assistance is to be used for "the production, preservation, and rehabilitation of rental housing…and for operating costs…"

Harvest Pointe, seniors, Mennonite Housing Rehabilitation Services (CHDO)
Newton, KS

New Construction

Forty-seven states allocated some or all their 2020 HTF funds to 159 new construction projects estimated to have 10,032 total units, 1,127 of which were assisted with 2020 HTF funds (1,497 HTF-assisted units if not prorated to reflect HTF from previous and/or subsequent years' allocations). The 47 states allocated $198,946,297 in 2020 HTF funds to those new construction projects ($277,477,250 total HTF, counting HTF funds from previous and/or subsequent years' allocations). Alabama, Arkansas, California, the District of Columbia, Florida, and Washington had policies for 2020 that only accepted applications for new construction projects.

Adaptive Reuse

Ten states reported allocating HTF funds for the "adaptive reuse" of 12 non-housing structures to create 586 new housing units (100 units assisted with 2020 HTF funds and 153 units assisted with HTF funds from other years). These adaptive reuse projects used $19,821,877 in 2020 HTF funds ($29,388,484 using HTF funds from previous and/or subsequent HTF allocation years). New Mexico has had an adaptive reuse policy focused on converting hotels into affordable housing units, offering up to 10 points (out of 115) if the conversion yielded 10 ELI units, 10 VLI units, and 10 market-rate units (for a total of 30 units). More details are available on page 42.

Preservation

Twenty-three states allocated $52,628,081 in 2020 HTF ($84,287,404 in total, counting HTF funds from other years' allocations) to preserve a total of 2,992 affordable units (333 assisted with 2020 HTF funds, 458 HTF-assisted units if not prorated to reflect HTF from other years' allocations) in 41 existing affordable housing projects.

Five states had 2020 policies that gave competitive points or unspecified preference to HTF applications that would preserve affordable housing: Louisiana gave up to five points (out of 100) for preserving at least 60% of the units at a property receiving Section 8 Project-Based Rental Assistance (PBRA) or Rural Development (RD) Section 515 assistance (four points if at least 40%-59% of the units were federally assisted, and three points if at least 20%-39% of the units were federally assisted). Oklahoma gave five points (out of 57) for preservation. Pennsylvania gave up to 20 points (out of 204) for preservation if a property was at risk of leaving the affordable stock due to conversion to market-rate or sale, as well due to the risk of loss as the result of deteriorated physical condition. South Dakota gave 10 points (out of 940), and Tennessee gave preference to preservation of existing PBRA-assisted properties. Indiana, however, had a policy prohibiting HTF to be used for the preservation of existing affordable housing in 2020. More details are available on page 36.

Rehabilitation Creating New Housing

As reported to NLIHC, three states awarded $3,936,929 in HTF to five projects that fell under the categories of "rehabilitation" or "acquisition and rehabilitation." However, further research determined these projects not to be preservation or adaptive reuse projects after all; instead they were projects that would create 95 new affordable housing units (17 HTF-assisted). More details are available on page 48.

Rehabilitation Only

As best as NLIHC could determine, only three projects were simple "acquisition and rehabilitation" projects. These projects were anticipated to use $1,695,393 in HTF funds for 57 units, 13 of which were to be HTF-assisted – meaning that they must be affordable to awarding their 2017, 2018, and 2019 HTF allocations, respectively.

Peaks of Sterlington, Veterans, disabled, seniors, Landbridge Development
Sterlington, LA

TARGETED POPULATIONS

STATE POLICIES AND PRACTICES FOR TARGETING SPECIAL NEEDS POPULATIONS

Relying on information provided by states in their 2020 HTF Allocation Plans, Annual Action Plans, or application materials such as Requests for Proposals (RFPs) or Notices of Funding Availability (NOFAs), NLIHC observed that some states have established policies, set-asides, or competitive points for using HTF funds to provide affordable housing for people with various special needs. Even though a state might have a policy or set-aside, that does not necessarily lead to a policy or set-aside being fulfilled. That is because states must commit HTF allocations, within two years, and a project meeting a targeting goal, for example, might not be far enough along IN the development process to submit an HTF application. In addition, states with set-asides acknowledge that if a project that might fit a set-aside is not proposed or does not meet other state criteria, uncommitted set-aside HTF funds can be used to assist other projects.

Appendix A provides a detailed description of states' policies, set-asides, and competitive points for special needs populations. Twenty-three states have specific provisions pertaining to projects targeting HTF funds to people experiencing homelessness. Twenty-one states' provisions are specific to people with disabilities. Twenty-six states' provisions are a mix of various special needs populations that in addition to homelessness or disability might include elderly people, domestic violence survivors, youth exiting foster care, veterans, and people with HIV/AIDS. Fifteen states have provisions regarding permanent supportive housing (PSH). Seven states have provisions regarding seniors. Seven states have provisions regarding veterans.

Safe Voices, domestic violence survivors, Safe Voices, Farmington, ME

Snow School Apartments, seniors, Avesta Housing, Fryeburg, ME

TABULATION OF PROJECTS AND UNITS BY TARGETED POPULATION TYPE

Note: Some projects will serve mixed populations of families without special needs, as well as homeless households and/or households with a member who has a disability. In the lists below, some units are "double counted." Such units could include, for example, units in projects reported as "homeless disabled," which appear in both the "Homeless" and "Disabled" categories.

Also, in the HTF unit counts reported below, NLIHC prorates the number of HTF-assisted units counted toward a state for 2020. This is because a number of projects were assisted with HTF allocations from a previous year's HTF allocation and/or a subsequent year's HTF allocation. In the lists below, following the 2020 prorated unit count, a total count of HTF-assisted units for a project is indicated in parentheses; the absence of a unit count in parentheses means a project only used 2020 funds.

Hickory Ridge Place, General occupancy, Enterprise Community Development
Columbia, MD

Maple Woods, Seniors, Harborlight Homes, Wenham, MA
Photo: Marshall Dackert

People Experiencing Homelessness

Fifty-six projects assisted with HTF funds in 25 states planned to serve homeless households in 1,893 units. Of these 1,893 homeless units, at least 193 units were assisted with 2020 HTF funds (726 total units were assisted with all years' HTF funds). These include:

- No distinction indicated: 17 states, 32 projects, 268 units assisted with 2020 HTF funds (395 total units with all years' HTF funds).

- Chronically homeless: 6 states, 9 projects, 123 units assisted with 2020 HTF funds (152 total units with all years' HTF funds).

- Homeless veterans: 4 states, 4 projects, 41 units assisted with 2020 HTF funds.

- Homeless women and/or their children: 3 states, 3 projects, 33 units assisted with 2020 HTF funds (48 total units with all years' HTF funds).

- Homeless with chronic mental illness or intellectual or developmental disability: 2 states, 2 projects, 7 units assisted with 2020 HTF funds.

- Homeless youth exiting foster care: 2 states, 2 projects, 17 units assisted with 2020 HTF funds.

- Homeless families with children: 2 states, 4 projects, 9 units assisted with 2020 HTF funds.

- Homeless seniors: 3 states, 3 projects, 12 units assisted with 2020 HTF funds.

- Homeless domestic violence survivors: 1 state, 1 project, unknown number of units assisted with 2020 HTF funds.

Merrimack Corner, seniors, Bethany Community Services, Inc., Haverhill, MA

Cathedral Arts Apartments, general occupancy, MHT Housing, Detroit, MI

For 12 projects, it was not possible to determine the number of HTF-assisted units used for people experiencing homelessness because those projects also assisted people with other special needs.

People with Disabilities

Thirty-six projects assisted with HTF funds in 22 states planned to serve people with disabilities in 575 units. Of these 575 units, 228 units were assisted with 2020 HTF funds (265 total units were assisted with all years' HTF funds). These include:

- No distinction indicated: 7 states, 13 projects, 64 units assisted with 2020 HTF funds (87 total units with all years' HTF funds).

- Developmental disability: 3 states, 4 projects, 19 units assisted with 2020 HTF funds (21 total units with all years' HTF funds).

- Youth with developmental disability: 1 state, 1 project, 8 units assisted with 2020 HTF funds.

- Physical disability: 4 states, 5 projects, 24 units assisted with 2020 HTF funds (35 total units with all years' HTF funds).

- Mental disability: 4 states, 5 projects, 46 units assisted with 2020 HTF funds (48 total units with all years' HTF funds).

- Mixed mental, developmental, or physical disability: 2 states, 3 projects, 19 units assisted with 2020 HTF funds (33 total units with all years' HTF funds).

- Disabled veterans: 1 state, 2 projects, 8 units assisted with 2020 HTF funds.

- Disabled seniors: 1 state, 1 project, 6 units assisted with 2020 HTF funds.

- High-functioning adults on the autism spectrum: 1 state, 1 project, 10 units assisted with 2020 HTF funds.

- Transition from nursing home: 1 state, 1 project, 10 units assist with 2020 HTF funds.

Seniors

Fifty-two projects assisted with HTF funds in 25 states planned to serve seniors in 3,309 units. Of these 3,309 units, 381 were assisted with 2020 HTF funds (534 total units were assisted with all years' HTF funds). These include:

Clawson Manor, seniors, preservation of Section 202 project, CSI Support & Development Services, Clawson, MI

East Conifer Estates, PSH homeless singles and families, Headwaters Housing Development Corporation, Bemidji, MN

- No distinction indicated: 22 states, 47 projects, 359 units assisted with 2020 HTF funds (518 total units with all years' HTF funds).
- Seniors experiencing homelessness: 2 states, 2 projects, 11 units assisted with 2020 HTF funds.
- Seniors in projects with mixed special needs populations: 1 state, 2 projects, 8 units assisted with 2020 HTF funds.
- Seniors mentoring youth exiting foster care: 1 state, 1 project, 4 units assisted with 2020 HTF funds.

Restoring Waters, PSH homeless single women and female-headed households, Project Pride in Living and Emma Norton Services, Photo courtesy of Alex Carroll Photography, St. Paul, MN

Mixed Special Needs Populations

Thirteen projects assisted with HTF funds in 23 states planned to target 211 units for an unspecified mix of special needs populations without being limited to one type of special needs population, such as homeless, disabled, or elderly populations. Of the 211 units, 46 were planned to be assisted with 2020 HTF funds, with 152 units also assisted with HTF funds from previous and/or future years' HTF allocations.

Permanent Supportive Housing

Although NLIHC is not confident that all SDEs indicated whether a project entailed permanent supportive housing (PSH), 24 states did indicate PSH with 64 projects containing 608 PSH units assisted with 2020 HTF funds (783 total units assisted with all years' HTF funds).

Other Special Needs Targeting

Veterans:
Seven states and eight projects were assisted with 2020 HTF funds. These projects had 78 units set aside for veterans. However, it was not possible to determine how many of these units were HTF-assisted for six of the projects because the veteran set-asides were among other special needs set-asides that comprised a larger percentage of total units and/or exceeded the number of declared HTF-assisted units. Of the 78 units, 39 were set aside for veterans experiencing homelessness.

Youth Aging Out of Foster Care:
Three states and four projects were assisted with 2020 HTF funds. These projects had 64 units set aside for youth aging out of foster care. Of these 64 units, three projects had 23 units assisted with $4,314,372 in 2020 HTF funds. One of the four projects was a 36-unit development with 26 units targeted for seniors and 10 units for youth exiting foster care who were to be mentored by the project's seniors (this project had only 4 HTF-assisted units, so NLIHC assumes these were probably devoted to the senior units).

Boulevard Apartments, general occupancy, Human Resources Development Council
Bozeman, MT

Domestic Violence Survivors:
Four states and six projects were assisted with 2020 HTF funds. These projects had 44 units set aside for domestic violence survivors. Of these 44 units, four projects had 10 units assisted with $3,279,369 in 2020 HTF funds. It was not possible to determine how many of the units at two projects reflecting 34 units set aside for domestic violence survivors were HTF-assisted because the domestic violence survivor set-asides were among other special needs set-asides that comprised a larger percentage of total units and/or exceeded the number of declared HTF-assisted units.

Substance Abuse/Sober Living:
Four states and four projects were assisted with 2020 HTF funds. These projects had 130 units set aside to serve people with substance abuse problems. Of these 130 units, three projects had 39 set-aside units assisted with $ 3,015,951 in 2020 HTF funds. One project specifically provides sober living for women and their families, another specifically serves women with children, and a third does not specify a specific subgroup. It is not possible to determine how many of the units at the fourth project reflecting 10 units set aside for people with substance abuse problems were HTF-assisted because the substance abuse set-aside was among other special needs set-asides that comprised a larger percentage of total units and/or exceeded the number of declared HTF-assisted units.

HIV-Affected Families:
One state with one project entirely devoted to serving HIV-affected families contains 13 units, 10 of which were assisted with $2,490,000 in 2020 HTF funds and $741,007 in 2019 HTF funds.

Households with Children:
One state with one project set aside 27 out of 66 units for households with children, devoting $1,300,000 in 2020 HTF funds.

Native Americans

South Dakota set aside $600,000 and North Dakota set aside 10% of their $3 million HTF allocations for projects developed within Indian reservations or on Tribal land held in trust. In addition, South Dakota offered 50 points (out of 940) for projects developed within an Indian reservation. However, neither South Dakota nor North Dakota reported using 2020 HTF funds for projects developed by or located on Tribal lands. Apparently, no such projects either applied for HTF or met the HTF threshold criteria; consequently, the set-asides rolled over to the states' general HTF pool. New Mexico provides five points (out of 115) if a developer is a Tribally Designated Housing Entity. In 2020, one New Mexico HTF-assisted project was developed by the Mescalero Apache Tribal Housing Department. Wisconsin's HTF Allocation Plan states that it has a "preference for projects located on federally designated Tribal land," and elsewhere the HTF Allocation Plan indicates that such projects are a "priority." Finally, Minnesota awarded HTF to a project developed by the Headwaters Regional Development Corporation in partnership with the Red Lake Housing Authority of the Red Lake Band, Ojibwe Nation.

Large Family Units

Some SDEs offered information about HTF-assisted properties with more than two-bedroom units, even though NLIHC did not specifically request such information. Further NLIHC research was used to supplement the information obtained from SDEs that did not offer such information. Nevertheless, the number of states and projects with three- or four-bedroom units is probably greater than reported here. Seventy-six projects in 35 states are projects with three- or more-bedroom units. Of these projects, NLIHC has learned that 48 definitely have 614 three-bedroom units (it is not possible to know how many are HTF-assisted). In addition, at another 27 projects, we know only that they include an unspecified mix of one-, two-, and three-bedroom units. Five of these 27 projects with an unspecified mix also have four-bedroom units (and one of these has five- bedroom units). Ten states have 12 projects with 59 five-bedroom units.

Fire Tower Apartments, general occupancy, Wishcamper Developers, Helena, MT

Five of the projects with large numbers of three-bedroom units and/or with four- or five-bedroom units were assisted through HUD's Rental Assistance Demonstration (RAD) program, which converts existing public housing developments (that often have large bedroom size units) to Project-Based Vouchers (PBVs) or Project-Based Rental Assistance (PBRA). Thus, these larger units are not a net addition to the housing stock; they do, however, preserve some larger units that are affordable to former public housing residents. Likewise, two additional projects replace former public housing developments that were not converted under RAD but do replace former public housing that was demolished in prior years, though not apparently through HUD's Section 18 Demolition/Disposition program.

1120 Lofts, general Occupancy, all three- and four-bedroom units, Arch Icon Omaha, NE

Hearthstone, seniors, Homeword, Anaconda, MT

Golden Rule Senior Apartments, seniors, Neighborhood Housing Services of Southern Nevada, Las Vegas, NV

TYPES OF PROJECTS

The statute creating the HTF states that "[t]he purpose of the Housing Trust Fund…is to provide grants to States for use to increase and preserve the supply of rental housing for extremely low-income and very low-income families, including homeless families." Regarding rental housing, the statute states that HTF assistance is to be used for "the production, preservation, and rehabilitation of rental housing…and for operating costs…"

FURTHER DISCUSSION ABOUT TYPES OF PROJECTS

HUD's Office of Community Planning and Development (CPD) has long used the Integrated Disbursement and Information System (IDIS) to manage information. The only options for users entering information about a project that might pertain to "preservation" or "adaptive reuse" are "rehabilitation" or "acquisition and rehabilitation." Upon closer examination, all but three of the projects reported to NLIHC as "rehabilitation" or "acquisition and rehabilitation" projects were intended to (1) preserve affordable homes, preventing them from leaving the scarce affordable home stock; (2) create new homes through adaptive reuse; or (3) create new homes for extremely low-income or very low-income households by acquiring and rehabilitating unoccupied homes.

Preservation

As reported to NLIHC, 23 states chose to award $52,628,081 in 2020 HTF funds ($84,287,404 in total, counting HTF funds from other years' allocations) for various forms of "preservation" at 41 existing affordable housing projects, intended to preserve a total of 2,992 affordable units (333 assisted with 2020 HTF funds and 458 HTF-assisted units if not prorated to reflect HTF from other years' allocations). By choosing to use available resources, including the HTF, these states decided to preserve projects to keep existing affordable units affordable and available to extremely low-income households rather than allow the units to be lost and thereby contributing to the shortage of such units.

Marvel Way Phase I, PSH sober living facility for women and their families, Community Development Partners and The Empowerment Center, Reno, NV

Preserving HUD- and USDA-Assisted Housing

Of the 23 states using 2020 HTF to preserve the 41 existing affordable housing projects referenced in the previous paragraph, 17 states used HTF funds to preserve projects that previously received federal taxpayer investments through seven federal programs: HUD's Section 8 Project-Based Rental Assistance, public housing, Section 18 Demolition/Disposition of public housing, Choice Neighborhood Assistance (CNI), and Section 202 Supportive Housing for the Elderly programs; USDA's Rural Development (RD) Section 515 rental assistance program; and the Treasury Department's Low Income Housing Tax Credit (LIHTC) program. Those 17 states used $23,486,876 of their 2020 HTF allocations ($32,895,866 in total, counting HTF funds from other years' allocations) at 22 projects to preserve a total of 1,591 units (152 units assisted with 2020 HTF funds, 256 total HTF-assisted units if not prorated to reflect HTF from other years' allocations).

- Section 8 Project-Based Rental Assistance: Eight states used $13,749,012 of their 2020 HTF allocations ($18,523,022 in total, counting HTF funds from previous and/or subsequent years' allocations) to preserve a total of 909 units at 12 projects with 96 units assisted with 2020 HTF funds (131 total HTF-assisted units if not prorated to reflect HTF from other year's allocations).

Vista del Sol Apartments, seniors + 14 units for non-elderly with physical or cognitive disabilities, Accessible Space, Las Vegas, NV

- Public Housing: Three states used $2,818,662 of their 2020 HTF allocations to "replace" previously demolished public housing at four projects with 189 units (18 HTF-assisted).
  - One local public housing agency (PHA) used HUD's Choice Neighborhoods Initiative (CNI) funding to replace 518 units of public housing demolished at two developments. One of the replacement developments contains 43 units (five HTF-assisted) and the other development contains 38 units (five HTF-assisted). The PHA used $700,000 in 2020 HTF funds at each project.
  - In 2013, a local PHA demolished a public housing development containing 100 units because it was uninhabitable. One phase of redevelopment apparently is using $668,662 in HTF funds to construct 84 units (three HTF-assisted). Residents of the former public housing will have a right to return if they choose. The project is not a RAD project and there is no indication that the project involved HUD's Section 18 demolition/disposition process.
  - Two related public housing developments containing 78 units built in 1942 were demolished. Phase one of redevelopment constructed 54 new units, while $750,000 of 2020 HTF was used for phase two of the redevelopment effort to construct another 24 units (five HTF-assisted), apparently using HUD's Mixed-Finance program.

- Section 18 Demolition/Disposition: Two states used HUD Section 18 Demolition/Disposition procedures to demolish existing public housing containing 102 units and construct replacement units subsidized with Project-Based Vouchers (PBVs) using $2,269,660 in 2020 HTF allocations to preserve/replace 102 units (seven units assisted with HTF funds).

- Section 202 Supportive Housing for the Elderly: One state used $1,493,002 of their 2020 HTF allocation ($6,128,022 in total counting HTF funds from previous and/or subsequent years' HTF allocations) to preserve a total of 251 units, with 10 units assisted with 2020 HTF funds (40 total HTF-assisted units if not prorated to reflect HTF from other years' HTF allocations).

- Rural Development Section 515: Two states used $2,474,568 of their 2020 HTF allocations to preserve a total of 96 units in two projects with 26 units assisted with 2020 HTF funds.

- Low Income Housing Tax Credit (LIHTC): One project with 44 units (five HTF-assisted) for seniors was originally built in 1992 with LIHTC financing. The original owner wished to sell the property after the initial 15-year "compliance period," jeopardizing continued use of the property as one "affordable" to households with income less than 60% of the area median income. A nonprofit "preservation purchaser" stepped in to purchase the property and renovate it, assisted with $681,972 in 2020 HTF funds, ensuring that it would remain affordable after LIHTC year 15.

Preserving Other Affordable Housing Units

Another seven projects in seven states intended to preserve existing affordable housing that had not previously received federal taxpayer investments like those discussed above. The seven projects would make available a total of 485 units with 89 units assisted with $11,841,739 from 2020 HTF allocations. Various means were used to preserve these properties:

- SDEs in two states indicated that two projects were "preservation" projects. The SDEs did not imply that any federal program had assisted the projects. A total of 334 units were to be preserved, 32 of which would be assisted with $4,759,226 in 2020 HTF funds.

Champlin Place, PSH seniors, Easter Seals of New Hampshire, Rochester, NH

- One SDE indicated $3,231,007 in 2020 HTF funds assisted in "repurposing" three buildings which were formerly apartment buildings containing 13 units and that were used later as a women's housing facility that closed in 2017.

- One SDE indicated that $388,950 in HTF funds helped "convert" a six-unit building into 11 PSH units for youth experiencing homelessness.

- Substantial rehabilitation was entailed to preserve existing affordable housing at three projects in three states. A total of 100 units were to be preserved, 33 of which would be assisted with $3,462,556 in 2020 HTF funds. One of the projects entailed substantial rehabilitation of nine structures originally constructed in the early 1900s. Another project entailed substantial rehabilitation of five historic buildings.

Nashua Soup Kitchen and Shelter, 11 PSH homeless units, Adaptive reuse, NSKS (Nashua Soup Kitchen and Shelter), Nashua, NH

Rental Assistance Demonstration

Nine states used some of their 2020 HTF allocations at twelve public housing developments to undertake conversion from public housing units to Section 8 Project-Based Rental Assistance (PBRA) units or Section 8 Project-Based Vouchers (PBV) units through the Rental Assistance Demonstration (RAD). This enabled most if not all of those former public housing units to be preserved as affordable and available to extremely low-income households. A total of 916 units, 92 assisted with 2020 HTF allocations (113 total HTF-assisted units if not prorated to reflect HTF from previous and/or subsequent years' allocations) would be preserved by using $17,299,446 in 2020 HTF allocations ($21,026,797 in total, counting HTF funds from other years' allocations).

NLIHC appreciates the necessity of RAD because Congress has consistently failed to appropriate sufficient public housing Capital Funds in order to maintain existing public housing in decent, safe, and sanitary condition. Rough estimates suggest that there is at least a $100 million backlog in public housing capital improvements. However, using very limited HTF funds as minor gap funding for RAD projects (that entail tens of millions of dollars) does not yield a net addition of physical units available and affordable to extremely low-income households because PBVs and PBRAs ensure that (in general) assisted households do not have to spend more than 30% of their adjusted income on rent and utilities.

6 Novad Court, PSH homeless families, under construction, April 2025
Affordable Housing Alliance (AHA), Millstone Township, NJ

Mountain Lakes Disabled Veterans Housing, PSH families of disabled veterans,
Nouvelle LLC, Borough of Mountain Lakes, NJ

810 Dunlewy Street, PSH domestic violence survivors or homeless or disabled,
HABcore, Asbury Park, NJ

Egbert Street Supportive Housing, PSH domestic violence survivors, Project of the Year, Supportive Housing Association of New Jersey, Salt&Light, Pemberton, NJ

Egbert Street Supportive Housing, PSH domestic violence survivors, Project of the Year, Supportive Housing Association of New Jersey, Salt&Light, Pemberton, NJ

Project Home XVII, PSH for homeless households with at least one child under 18, family who moved from a homeless shelter to one of two adjacent units, Homes by TLC, Ewing Township, NJ

Wood Avenue, PSH domestic violence survivors, Triple C North Brunswick Township, NJ

Adaptive Reuse

Ten states reported to NLIHC that 12 projects would fall under the categories of "rehabilitation" or "acquisition and rehabilitation;" however, these projects are in fact "adaptive reuse" projects. These projects actually would *create* 586 new units (100 assisted with 2020 HTF funds and 153 units assisted with HTF funds from previous and/or subsequent years' allocations) using $19,821,877 in 2020 HTF funds and $29,388,484 including HTF funds from other years' allocations. As a reminder, HTF cannot be used to subsidize non-housing components of such projects, which include the following:

- In Fresno, California, the nonprofit RH Community Builders and for-profit UP Holdings converted the 200-unit Smuggler's Inn motel, consisting of eight two-story buildings, into 143 affordable homes, with 30% of the units set aside as permanent supportive housing (PSH) for people who experienced chronic homelessness. UP Holdings purchased the property in 2020 utilizing the state of California's HomeKey Program to provide emergency rapid-rehousing during the COVID-19 pandemic with the proviso that the units ultimately become permanent housing. The developers needed to add full kitchens and decided to give each unit outside door access, rather than use the motel's previous hallway access. Vacancies are filled through the area's homelessness Continuum of Care's (CoC's) coordinated entry system. Wrap-around support services are provided by the Fresno County Department of Behavioral Health.
- In Farmington, Maine, the nonprofit Safe Voices converted the former doctors' offices of the Franklin Memorial Hospital into two apartments for survivors of domestic violence survivors. (Because emergency shelter beds are not permanent housing, HTF does not subsidize this portion of the project).

Wanaque Veteran Housing, PSH families of disabled veterans, Nouvelle LLC
Ringwood, NJ

- In Lincoln, Nebraska, the nonprofit CenterPointe converted to affordable housing, a historic 94-year-old building that originally served as a student nurse dormitory for 40 years and that had most recently served as offices for the county. The conversion created 32 studio apartments for people with disabilities. The top floor (fourth floor) has 16 units and common spaces. The third floor is nearly the same but is used for transitional housing. (Because transitional housing is not permanent housing, HTF does not subsidize the third floor.) The second floor has workspaces for 60 staff members providing a continuum of care for people with mental health and substance abuse problems. The first floor is an outpatient clinic, and the Garden level has spaces for a Crisis Response Team, community education, and a teaching kitchen, as well as a public garden.

Encantada, General occupancy, Preservation of RD Sec 515 properties
Catholic Charities Housing (CC Housing), Las Lunas, NM

- In Nashua, New Hampshire, the nonprofit Nashua Soup Kitchen and Shelter (NSKS) preserved a historic school building and converted it into a mixed-use property, including 11 PSH for people experiencing homelessness on the fourth floor. The third floor will have a 48-bed family shelter, the second floor will have a 14-bed shelter for single women, and the first floor will have an 18-bed shelter for single men. (Because shelter beds are not permanent housing, HTF does not subsidize these other floors.) The project also includes two flexible classrooms for a wide range of supportive programs for NSKS clients and other community members. Spaces for onsite health care, childcare, and other services make it possible for NSKS to fully support clients in accessing stable housing.

- In Buffalo, New York, the nonprofit CDS Monarch converted Public School 78, built in 1927 and on the federal and state Registers of Historic Places, to 46 affordable housing units. The school's former auditorium was converted into a community center where nonprofits can provide services and programs.

- In Albany, New York, the for-profit Home Leasing converted a former school into 13 units of affordable housing. The project also redeveloped four vacant townhouses, each with 13 units and constructed a four-story building with 36 units along with space dedicated to the Albany Center for Economic Success (ACES).

Edna Craven Estates, 20 units for domestic violence survivors and 20 units for people with severe mental illness, CDS Monarch, Rochester, NY

Fairmont Park Apartments, general occupancy, Serving the Elderly through Project Planning (SEPPP), Union, NY

Erie Point, 20 units PSH homeless, The Community Builders, Cohoes, NY

Erie Point, 20 units PSH homeless, The Community Builders, Cohoes, NY

Unity House, 26 PSH homeless, Unity House and Troy Rehabilitation and Improvement Program (TRIP) with MM Development Advisors, Troy, NY

Hillside Views, one of seven in-fill townhouses, Unity House and Troy Rehabilitation and Improvement Program (TRIP) with MM Development Advisors, Troy, NY

La Plaza de Virginia, seniors, Hispanos Unidos de Buffalo (HUB), Buffalo, NY

Lock 7 Apartments, PSH: 30 units mental health, 40 units homeless, DePaul Properties Oswego, NY, Photo: Gene Avallone

Northwoods, 40 PSH homeless, Housing Visions Unlimited, Plattsburgh, NY

Reynolds Way Apartments, PSH 13 homeless units, previously vacant historic buildings, Arbor Housing and Development, Emira, NY

Reynolds Way Apartments, PSH 13 homeless units, previously vacant historic buildings, Arbor Housing and Development, Emira, NY

Reynolds Way Apartments, PSH 13 homeless units, previously vacant historic buildings, Arbor Housing and Development, Emira, NY

Reynolds Way Apartments, PSH 13 homeless units, previously vacant historic buildings, Arbor Housing and Development, Emira, NY

- In Elmira, New York, the nonprofit Arbor Housing and Development converted a four-story former warehouse into three studio apartments, ten one-bedroom apartments, and one two-bedroom apartment. The project also entailed redevelopment of three vacant residential properties with 27 additional units (these units are reflected elsewhere in this report).
- In Woonsocket, Rhode Island, the nonprofit NeighborWorks Blackstone River Valley converted three mill buildings on the National Register of Historic Places into six studio, 59 one-bedroom, and five two-bedroom apartments. Eleven of the apartments are subsidized by HUD's Section 811 Supportive Housing for Persons with Disabilities program. One of the buildings was constructed in 1874 and served as a carriage repair and blacksmith shop. The two other buildings, built in 1875 and 1900, were used by the Woonsocket Rubber Company.
- In Austin, Texas, the nonprofit Foundations Communities converted a former hotel into 123 units of PSH for people experiencing homelessness.
- In Rutland, Vermont, the nonprofit Housing Trust of Rutland County converted a former school into 19 units of PSH for people experiencing chronic homelessness. The school's gymnasium and stage were preserved to be used for community events. Services are provided by the Community Care Network of the Rutland Mental Health and Homelessness Prevention Center.

Olympic Avenue Apartments, general occupancy, CDS Monarch, Buffalo, NY

Veddersburg Apartments, 31 PSH people with mental health disabilities, DePaul Properties, Amsterdam, NY

- In rural Pulaski, Virginia, the for-profit Landmark Asset Services converted a school on the National Register of Historic Places built in 1952 into 23 units of affordable housing. The project also entailed constructing a new three-story building behind the school with an additional 27 units.

- In Milwaukee, Wisconsin, the for-profit Gorman and Company created 63 units of senior housing from a former school building constructed in 1924 and on the National Register of Historic Places as well as having state historic status. The project also entailed the new construction of 12 townhouses for families.

New Homes Created through Acquisition and Rehabilitation

As reported to NLIHC, three states awarded $3,936,929 in 2020 HTF to five projects categorized as "rehabilitation" or "acquisition and rehabilitation" projects, which further research showed would *create 95* new affordable housing units (17 HTF-assisted). The projects that would create new units include:

Landon Green, seniors, Woda Cooper Companies, Statesville, NC

- A project to acquire four distinct vacant houses in order to rehabilitate 10 units for PSH for homeless youth who have aged out of foster care. This is part of a larger project that includes new construction of townhouses for LGBTQ+ youth and the conversion of a former pub to be used as a drop-in center with a conference room for meetings and training programs.

The Covenant, seniors, East Carolina Community Development, Castle Hayne, NC

The Meadows at Troutman, general occupancy, Churchill Stateside Group Troutman, NC

- Two projects in one state to acquire uninhabitable small properties in order to completely renovate them to provide PSH for domestic violence survivors.

- A project to redevelop four vacant townhouses, each with 13 units (52 units in total) for general occupancy.

- A project to acquire four vacant buildings within one block of each other. Two of the buildings are on state and federal Registers of Historic Places. Thirteen of the units will be PSH for people experiencing homelessness.

Jackson Flats, seniors, Grand Forks Housing Authority, Grand Forks, ND

Rehabilitation Only

As best as NLIHC could determine, only three projects in three states fell under the category of "acquisition and rehabilitation" that might be a simple rehabilitation project. These projects were anticipated to use $1,695,393 in 2020 HTF funds to rehabilitate 57 units, 13 of which were to be HTF-assisted – meaning that the units must be affordable to extremely low-income households.

The Milton Earl, seniors, Beyond Shelter, Fargo, ND
Photo: Foss Architecture + Interiors

OTHER RESOURCES IN HOUSING TRUST FUND-ASSISTED PROJECTS

Busy state staff who were not required to respond to queries from NLIHC tended to provide minimal information about other resources in HTF-assisted projects. While some states' staff provided detailed and seemingly complete information about other sources of development financing, other states simply replied with one-word answers ("yes," for example) if appropriate. Still others did not provide any additional information about other resources. Consequently, the following information offers an incomplete picture of the other resources used in HTF-assisted projects.

Mulby Place, seniors, Columbus Housing Partnership (dba Homeport), Columbus, OH

- Low-Income Housing Tax Credits (LIHTCs): 167 projects in 46 states had 1,559 units assisted with 2020 HTF funds (1,955 total HTF-assisted units, including HTF from previous or subsequent HTF allocation years in these projects). Of these:
  - Thirty-one states awarded 9% LIHTCs to 88 projects with 860 units assisted with 2020 HTF funds (988 total HTF-assisted units, all HTF years in a project), with 13 states exclusively reporting 9% LIHTCs.
  - Thirty-three states awarded 4% LIHTCs to 67 projects with 648 units assisted with 2020 HTF funds (854 total HTF-assisted units, all HTF years in a project), with 13 states exclusively reporting 4% LIHTCs.
  - Three states awarded both 9% and 4% LIHTCs to 11 projects with 43 units assisted with 2020 HTF funds (105 total HTF-assisted units, all HTF years in a project).
  - One state indicated one project was financed with LIHTC but did not indicate whether 9% or 4% LIHTC was used.

Dunbury Greene, seniors, Housing Services Alliance and Woda Cooper Development Columbus, OH

By infusing LIHTC projects with HTF-assisted units, a small number of units in LIHTC projects will be more affordable to ELI households.

- No LIHTC: 46 projects in 23 states with 415 units assisted with 2020 HTF funds (540 total HTF-assisted units, all HTF years in a project).
- HOME: 95 projects in 37 states.
- Affordable Housing Program (AHP) of the Federal Home Loan Banks: 38 projects in 24 states.
- State and/or local housing trust funds: 64 projects in 25 states.
- Other state or local programs: 110 projects in 38 states.
- In addition, 36 projects received financial assistance from nine different federal programs:
    - Community Development Block Grant program (CDBG): 14 projects in 10 states (CDBG cannot be used to develop new housing, but it can be used to rehabilitate housing, or in the case of most of the 14 projects, acquire land or provide infrastructure).
    - Community Development Block Grant Coronavirus (CDBG-CV): 2 projects in 2 states. (CDBG-CV was extra CDBG-CV provided extra CDBG funding to jurisdictions during the COVID-19 pandemic, waiving some development regulations).
    - American Rescue Plan (ARP) funds: 8 projects in 7 states (ARP funds were appropriated by Congress during the COVID-19 pandemic. ARP allowed a wide range of eligible uses, including affordable housing).

EDEN Phase I, the East 162nd Street portion of scattered site infill housing, PSH mental health and/or physical disabilities, Emerald Development and Economic Network (EDEN), Cleveland, OH

- Historic tax credits (federal and state): 7 projects in 6 states.
- Capital Magnet Fund (CMF): 2 projects in 1 state.
- New Markets Tax Credit (NMTC): 1 project.
- Emergency Solutions Grant (ESG): 1 project (likely assisting an aspect of the project that did not entail permanent housing).
- Neighborhood Stabilization Grant (NSP): 1 project (NSP was a program in response to the foreclosure crisis resulting from the 2008 financial crisis).
- Section 811 Supportive Housing for Persons with Disabilities Capital Advance: 1 project.

Although NLIHC asked contacts in each state whether projects received resources from various private sources, many states did not provide this information. NLIHC's additional research sometimes revealed information about private sources for projects. However, because information is incomplete, the following can only provide a partial picture of the extent of private participation in HTF projects.

- Private mortgages/conventional financing: 81 projects in 34 states had conventional private mortgages.
- Deferred developer fee: 101 projects in 32 states used deferred developer fees as a resource.
- Developer/sponsor equity, loans, cash: 38 projects in 21 states had equity or other infusions of owner/sponsor resources.
- Foundations, charities: 41 projects in 23 states received grants from foundations, charities, and other private sources.

EDEN Phase I, the Guthrie House portion of scattered site infill housing, PSH mental health and/or physical disabilities, Emerald Development and Economic Network (EDEN), Cleveland, OH

EDEN Phase I, the Madison Townhomes portion of scattered site infill housing, PSH mental health and/or physical disabilities, Emerald Development and Economic Network (EDEN), Cleveland, OH

USE OF PROJECT-BASED RENTAL ASSISTANCE

The availability of project-based rental assistance, especially Project-Based Vouchers (PBVs), can help ensure that ELI households are not cost-burdened. Even though the HTF statute clearly prioritizes ELI renters, the statute is silent regarding the rent ELI households can pay. The HTF interim regulations state that the HTF rent plus utilities for an ELI household shall not exceed the *greater* of 30% of the federal poverty line or 30% of the income of a household whose annual income equals 30% of area median income (AMI). That 30% is the rent that a HTF owner may charge a HTF tenant; it is fixed at that level (of course an owner could set a fixed rent at a lower AMI level). Therefore, under HTF regulations, an ELI household's rent plus utility payment is not adjusted to their actual income the way it is under the public housing or the Housing Choice Voucher programs – meaning an ELI household in an HTF-assisted unit can be "rent cost-burdened," paying more than 30% of their actual household income for rent and utilities. For example, households depending on Supplemental Security Income (SSI) payments typically have income around 20% AMI, meaning they could be living in an HTF-assisted home but be cost-burdened, paying more than 30% of their adjusted income on rent and utilities.

Use of the "the greater of" threshold in the interim rule creates a serious, undesirable, and unintended consequence. An NLIHC analysis from 2016 showed that wherever the federal poverty guideline is higher than 30% of AMI, renter households with income at 30% AMI renting units with at least two bedrooms will be cost-burdened by maximum HTF rents in most HUD Fair Market Rent (FMR) areas, unless they also have rental assistance. Using the federal poverty guideline to set maximum rents for HTF units is problematic. This policy disproportionately impacts larger, poorer households who already have greater difficulty affording rents limited to 30% of their income. The negative impacts, moreover, are most apparent in the poorest communities, where the federal poverty guideline is much higher than 30% of AMI. NLIHC has urged CPD to change the final rule to read "the lesser of" from "the greater of."

States' HTF Allocation Plans and RFPs/NOFAs often indicate PBV policies, priorities, preferences, and competitive points.

Applegate Landing, 12 units set aside for veterans, CASA of Oregon, Lebanon, OR

Florida's policy since the beginning of the HTF program has been unique. Florida prioritizes applications that maintain units affordable to ELI households for at least 30 years *without* project-based rental assistance. The state asserts that combining capital subsidies for ELI units with project-based rental assistance limits the number of units available to ELI households – the state's objective is to create additional ELI units with HTF. Florida structures HTF awards in order to "buy down" 60% AMI units to 22% AMI rents for an extended period. Keep in mind, Florida also limits the number of HTF-assisted units in a moderately sized property to five or three units, allowing more HTF-assisted units in very large properties but still representing a very small percentage of total units. Because Florida's stated policy is unique, a portion of its 2020 Annual Action Plan (as in previous years) is quoted here at length:

Bridge Meadows Redmond, 26 units for seniors, 10 units for youth exiting foster care and their adoptive/guardianship families, Bridge Meadows, Redmond, OR
Photo: Paul Rich Studios

"Florida will prioritize applications for funding which are able to maintain units affordable to ELI households for at least 30 years without project-based rental assistance. Florida's experience indicates that combining capital subsidies for ELI units with project-based rental assistance is wasteful and limits the total number of units available to ELI households. Maximizing the number of units affordable to ELI households was a goal of Florida Housing long before Congress created the NHTF. For many years, Florida Housing worked to finance as many new ELI rental units as possible, because the need for these units is high. The rental programs administered by FHFC are competitive; consequently, the state is able to encourage the inclusion of project-based rental assistance in developments without the addition of NHTF.

Rather than using both types of funding to finance new ELI units, the state's objective is to create additional units with NHTF. Thus, Florida will not prioritize applications which utilize project-based rental assistance. FHFC established the maximum per-unit NHTF subsidy limits in this plan at a level that ensures that properties funded with NHTF will require less debt financing. With less hard-pay debt service, NHTF funded properties will have sufficient cash flow to support the ELI units for 30 years. Where this cross-subsidization is insufficient, FHFC expects applicants to establish an operating deficit reserve to offset projected operating losses from ELI units identified during underwriting. Operating deficit reserves may be funded with NHTF and/or from other sources. No more than one-third of the state's NHTF award will be used to fund operating deficit reserves."

North Carolina is also somewhat unique because it requires 10% of all units developed with LIHTC equity to be reserved for people with disabilities (referred to as "Targeted Units"). A project can opt to reserve up to 20% of units as Targeted Units. Targeted Units are eligible for Key Rental Assistance, a North Carolina-funded operating assistance program designed to ensure that these units are affordable to households with income as low as Supplemental Security Income level income (approximately 20% AMI). The Key Program also provides services and supports for the tenants it assists. The Targeted Units policy is part of the state's *Olmstead* settlement[2], as are the state's Transition to Community Living Vouchers (TCLV) which help people move from congregate settings into integrated PSH.

According to their HTF Allocation Plans or requests for applications, the District of Columbia, Indiana, Georgia, and Kentucky required applicants to have a commitment for Section 8 Project-Based Vouchers (PBVs) for HTF-assisted units.

Polk 2.0, Youth aging out of foster care who experienced homelessness
Corvallis Neighborhood Housing Service (dba DevNW), Eugene, OR

Georgia requires at least 10% of a project's total units to have or HAVE applied for project-based rental assistance. Georgia also offers competitive points (see the next discussion).

Louisiana, Maine, and New Jersey awarded HUD PBVs to all projects receiving HTF. Maine also offers competitive points (see the next discussion). New Hampshire can provide up to 50 PBVs if an applicant requests HTF assistance from the state's $1.25 million Supportive Housing for Homeless HTF set-aside. New Hampshire also offers points (see next discussion).

Delaware states that project-based rental assistance "may" be available from the state's Statewide Rental Assistance Program (SRAP) for PSH projects. Delaware also offers points (see next discussion). Massachusetts provided Massachusetts Rental Assistance Vouchers (MRAVs) to help finance HTF-assisted projects that provide supportive services, including up to $1,500 per year to help cover those supportive services.

Annabel Gardens, Seniors, Federation Housing, Willow Grove, PA
Photo: Jordan Cassway

[2]In the Olmstead decision, the U.S. Supreme Court found that the institutionalization of persons with disabilities who were ready to return to the community was in violation of Title II of the "Americans with Disabilities Act" (ADA). State and local governments are required to "administer services, programs, and activities in the most integrated setting appropriate to the needs of the qualified individuals with disabilities."

Twenty-seven states planned to provide competitive points to projects that had a commitment for PBVs:

- **Alabama** offers 25 points (out of 105) if a project has or will secure PBVs.

- **Alaska** offers eight points (out of 236) if at least 25% of the total units will have PBVs; Alaska requires these PBVs to have a 15-year term.

- **Anchorage** offers five points (out of 150) based on the percentage of units with PBVs.

- **Arkansas** indicates "an ability to secure rental assistance… will be a major factor" and offers 10 points (out of 100).

- **California** offers one point for each 5% increment of PBVs up to 15 points (out of 150).

Saxony Ridge Apartments, seniors with 10 units for homeless, and 12 units for mobility impaired, Community Basics, Lititz, PA

Meadow View Townhomes, general occupancy, Luminest Community Development Gettysburg, PA

Jordan Caffey Townhomes, general occupancy, Omni Development Corporation Providence, RI

- **Connecticut** limits awarding points to projects using HTF to house people who have experienced homelessness or who are at risk of homelessness. Connecticut can award five points (out of 120) if 5% to 10% of a project's units have a firm project-based rental assistance commitment, and eight points if a project has a firm project-based rental assistance commitment for 10% up to 20% of units.

- **Delaware** states that project-based rental assistance "may" be available from the state's Statewide Rental Assistance Program (SRAP) for PSH projects. In addition, the HTF Allocation Plan indicates that projects with new PBVs will be prioritized if they will serve individuals with mental health disabilities who are at risk of homelessness or at risk of institutionalization. These projects will receive some portion of 30 points (out of 100), but it is not clear what that portion might be because this is one of four categories competing for the 30 points. Also, projects in Sussex County and/or projects with other committed sources of rent subsidy will receive priority scoring; projects that can document that they have non-HTF operating assistance can receive 20 points (out of 100). Contradicting all of the above, the HTF Allocation Plan indicates that having project-based rental assistance is a "least important" priority.

- **Georgia** prioritizes projects with project-based rental assistance and offers points: nine points (out of 100) if the ratio of project-based rental assistance to total units is 4:1, six points if the ratio is 3:1, and three points if the ratio is 2:1; and nine points if the project-based rental assistance has a term of at least 15 or more years.

- **Idaho** offers two points (out of 115).

- **Illinois** prioritizes projects that have project-based rental assistance and states that applicants must be willing to accept project-based rental assistance, but probably not for more than 30% of all units in a project. Illinois can award up to 20 points (out of 100) depending on the number of units assisted and the length of the assistance commitment:
    - If more than 75% of units have rent assistance, a project can receive 20 points for a commitment of 10 years or more, or 10 points for a commitment between five and 10 years.
    - If 50% to 75% of units have rent assistance, a project can receive 15 points for a commitment of 10 years or more, or seven points for a commitment between five and 10 years.
    - If 10% to 50% of units have rent assistance, a project can receive 10 points for a commitment of 10 years or more, or five points for a commitment between five and 10 years.
    - If 1% to 10% of units have rent assistance, a project can receive five points for a commitment of 10 years or more, or three points for a commitment between five and 10 years.

The Radiant, general occupancy, CommonBond Communities, Rapid City, SD
Photo: Cody Lere

- **Indiana** can provide 15 points (out of 76) if 75% of a project's units have project-based rental assistance; 10 points if 50% of the units have project-based rental assistance.

- **Maine** can provide 15 points (out of 100) if PBVs are provided by local public housing agencies.

- **Minnesota** can provide 26 points (out of 286), along with additional points if project-based rental assistance has a 15-year term.

- **Mississippi** can provide 10 points (out of 100).

- **Nebraska** can provide 10 points (out of 70) based on the number of project-based rental assistance units in a project compared to total units.

- **New Hampshire** has an HTF-specific RFP that includes 50 PBVs that it can award to successful applications. In addition, the state can award up to five points (out of 115) if an applicant will have new project-based rental assistance (with a term of at least five years) from a source other than PBVs from the state for at least 66% of a project's units. Also, for HTF applications from the state's 9% LIHTC HTF set-aside, New Hampshire can offer 15 points (out of 230) if an applicant will have new project-based rental assistance (with a term of at least five years) from a source other than PBVs from the state for at least 66% of a project's units.

- **New Mexico** awards five points (out of 115) if an applicant has PBVs that make up less than 25% of a project's total units. In addition, New Mexico awards five points if an applicant does not have PBVs. The state considers this scoring criterion a "low priority."


Rex2, homeless, Urban Housing Solutions, Nashville, TN

Rex2, Homeless, Urban Housing Solutions, Nashville, TN

Shelby House, people recovering from substance abuse, Samaritan Recovery Community, Nashville, TN

- **New York** offers five points (out of 100).

- **North Dakota** offers five points (out of 168).

- **Ohio** offers 10 points (out of 50) based on the unspecified relative number of units in a project that have project-based rental assistance. In comparison, Ohio's 2019 HTF materials were more specific, offering 10 points if at least 25% of the units in a proposed project had rental assistance (not just PBVs), 15 points if at least 50% were rent-assisted, and 20 points if 100% were rent-assisted.

- **Oklahoma** offers five points (out of 57).

- **Oregon** offers up to five points (out of 100) if an application has federal Section 811 project-based rental assistance for people with disabilities, plus two points if a project has project-based rental assistance from other sources.

- **Rhode** Island can offer some unspecified portion of 30 points (out of 130) as one of three "Tier 1 priorities" that also consider whether a project is targeted to people with special needs.

- **Tennessee** offers an unspecified number of points out of 100 points.

- **Utah** offers two points (out of an unspecified total) if a project has project-based rental assistance, plus an additional two points if a project has project-based rental assistance from other funding sources.

- **West Virginia** offers 15 points (out of 100) if an application has rental assistance (not just PBVs) for at least 25% but less than 50% of a project's total units, 20 points for at least 50% but less than 75% of all units, and 25 points for at least 75% of all units.

Arbor Park, seniors, DMA Development, Austin, TX

- **Washington** offers one point for each 1% of units that have a project-based rental assistance commitment, up to 25 points (out of 100).

Eight states indicated that HTF applicants with project-based rental assistance would be given "priority," including Hawai'i, Kansas, and Nevada (as well as Delaware and Illinois, as mentioned above in the discussion about points). In the context of describing Colorado's top funding priority, supportive housing, the state writes that supportive housing "should" include project-based rental assistance. Maryland indicates that a project will have priority if all of its HTF-assisted units have project-based rental assistance, and that each of the project-based rental assistance units must have at least a five-year term with a renewal provision. Rhode Island indicates that having project-based rental assistance is a high priority, and offers some points (see previous section), while also indicating that applicants that already have project-based rental assistance or a commitment to receive project-based rental assistance will receive "preference" (see the next paragraph).

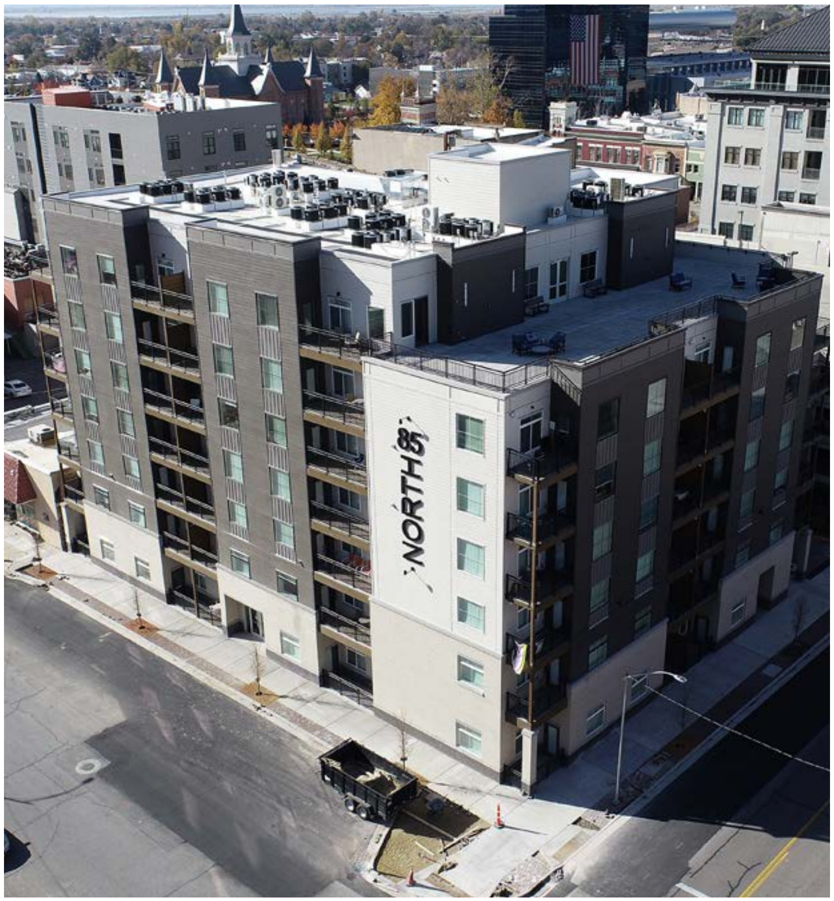
Balcones Terrace, PSH homeless, Adaptive reuse, Foundation Communities, Austin, TX

Three states had a "preference" for applicants with project-based rental assistance: Missouri, Rhode Island (also see previous entries), and Tennessee. Beginning in 2019 and continuing in 2020, South Carolina decided not to include a project-based rental assistance preference; instead, the state paired the South Carolina HTF with the national HTF in order to help applicant projects have zero debt burden.

The policy documents of three states – Pennsylvania, Vermont, and Washington – indicate that HTF applicants will be "evaluated" if they have a commitment of PBVs. Vermont also writes that the type of rent assistance and the length of the rent assistance's term will be "considered." Michigan and Texas will also consider the availability of project-based rental

Espero Austin at Rutland, PSH homeless, 15% veteran set-aside, Caritas of Austin
Austin, TX

assistance, although Texas states that priority in evaluating a project will be the creation of new units serving ELI households that would otherwise not exist. Montana indicates that an application will be "enhanced" if it has project-based rental assistance. Colorado indicates that an application "should" include project-based rental assistance if the project entails permanent supportive housing.



85 North Senior Phase I, seniors, Trinity Housing Development, Provo, UT

Harris Community Village, PSH homeless, Toole County Housing Authority, Toole, UT

Bellows Falls Garage, 6 units set aside for homeless, Windham & Windsor Housing Trust, Bellows Falls, VT, Photo: Ryan Bent

FORM OF ASSISTANCE

The HTF regulations offer states a wide range of options regarding the form of HTF assistance they can provide to projects. Here is a summary of the form of HTF assistance provided by states:

- Six states' HTF Allocation Plans or RFPs/NOFAs indicated that they provide HTF assistance in the form of grants: Alabama, Alaska, Arkansas, Indiana, and Tennessee. California provided three of its six projects with significant operating reserve funding as grants (while also providing 3% loans for constructing those projects).

Whitney Hill Homestead, seniors, Cathedral Square Corporation, Williston, VT

- Five states indicated that they provide some combination of grant- and loan-based assistance. Colorado generally provides grants to nonprofits and amortized or cash-flow loans at 0%-3% interest to for-profits that must partner with a nonprofit. Connecticut provides grants, non-interest bearing accounts, or deferred payment loans. Idaho provides grants and zero percent due on sale loans. Illinois provides grants, forgivable loans, and loans. Oregon provides either a grant or a loan, depending on the financing structure of a project.

- Four states indicated that they provide zero-interest, deferred payment loans: Kentucky, Minnesota, New Hampshire (for supportive housing set-aside applicants not using LIHTC), and Ohio.

- Three states indicated that they provide zero interest loans: Massachusetts, New Jersey, and New York.

- Eight states indicated that they provide forgivable loans: Florida, Georgia, Illinois, Maine, New Mexico (for projects not using LIHTC), Oklahoma, and Texas. South Carolina offers a forgivable loan and a loan with interest, and Wyoming offers forgivable loans as well as deferred loans.

- Three states indicated that they provide deferred payment loans: Connecticut offers deferred payment loans, non-interest bearing loans, as well as grants; Virginia (3% interest-only, deferred principal loan); and Wyoming (as well as forgivable loans).

- Five states indicate that they provide “cash flow loans”; the District of Columbia (at 0%-3%), Michigan (at 1%), Mississippi (only for nonprofits), New Mexico (non-interest bearing for projects using LIHTC), and Wisconsin (interest-only at 3%).

- Six states indicate that they provide loans with interest: California provides loans at 3% interest (in addition to grants for operating cost reserves). South Carolina offers loans with interest rates ranging from 0% to 3%, as well as forgivable loans. Virginia offers 3% interest-only, deferred principal loans. Illinois offers “loans” as well as grants and forgivable loans. Oregon offers “loans” as well as grants. Rhode Island offers “subordinated debt.” Washington offers two options. The first option is for three types of projects: 1) with at least half of all units affordable to households with income equal to or less than 30% AMI (urban areas) or 50% AMI (rural areas), 2) projects restricted to people experiencing homelessness, and 3) permanent supportive housing projects. These first option projects have loans at simple interest of 1% with all principal and interest due at the end of the 50-year loan period. All other Washington projects have 1% to 3% interest rates with payment due either quarterly or annually (as selected by the developer).

Burkeland, 9 PSH seniors plus 14 general occupancy, RuralEdge and Evernorth
Burke, VT, Photo: Sally McCay

Burkeland, 9 PSH seniors plus 14 general occupancy, RuralEdge and Evernorth
Burke, VT, Photo: Sally McCay

DURATION OF AFFORDABILITY PERIOD

The interim HTF regulations require HTF-assisted units to be occupied by extremely low-income households for at least 30 years. According to their HTF Allocation Plans or RFPs/NOFAs, four states required a longer "affordability period": California (55 years, or 50 years if a project is on Native American lands), Maine (45 years), Maryland (40 years), and Washington (40 years, down from 50 years in the recent past). Florida requires HTF-assisted units to still be "affordable" at 60% AMI for an additional 20 years after the HTF-required 30-year minimum. Pennsylvania's 2019 Allocation Plan indicated that the state underwrote applications for 35 years; however, the 2020 Allocation Plan now writes that it does not have any priorities for funding based on an affordability period beyond the HTF regulation's 30-year requirement.

Florida Terrace, PSH 8 chronically homeless, 4 developmentally disabled, Rush Homes Lynchburg, VA

Florida Terrace resident, Maggie

All projects in Vermont, not just HTF-assisted projects, must remain "affordable" in perpetuity; however, after 30 years, HTF-assisted units can revert to "less restrictive income and rent levels," and reasonable efforts must be taken to structure the project to avoid displacement after year 30. In addition, Vermont will give applications "consideration" if they propose to have HTF-units remain targeted to and affordable to ELI households after year 30 (rather than reverting to 60% AMI or 80% AMI, for example).

Nineteen states mentioned points for affordability periods greater than 30 years. The following list is arranged in order of descending length of affordability:

- The **District of Columbia** awarded five points (out of 200) for perpetual affordability.

South First Street Phase I, General occupancy + 10 PSH units, Charlottesville Redevelopment and Housing Agency, Charlottesville, VA

Ovation at Arrowbrook, general occupancy, 6 units PSH developmentally disabled, SCG Development Partners, Herndon, VA

Martha's Place, PSH homeless, Catholic Housing Services of Western Washington Mount Vernon, WA

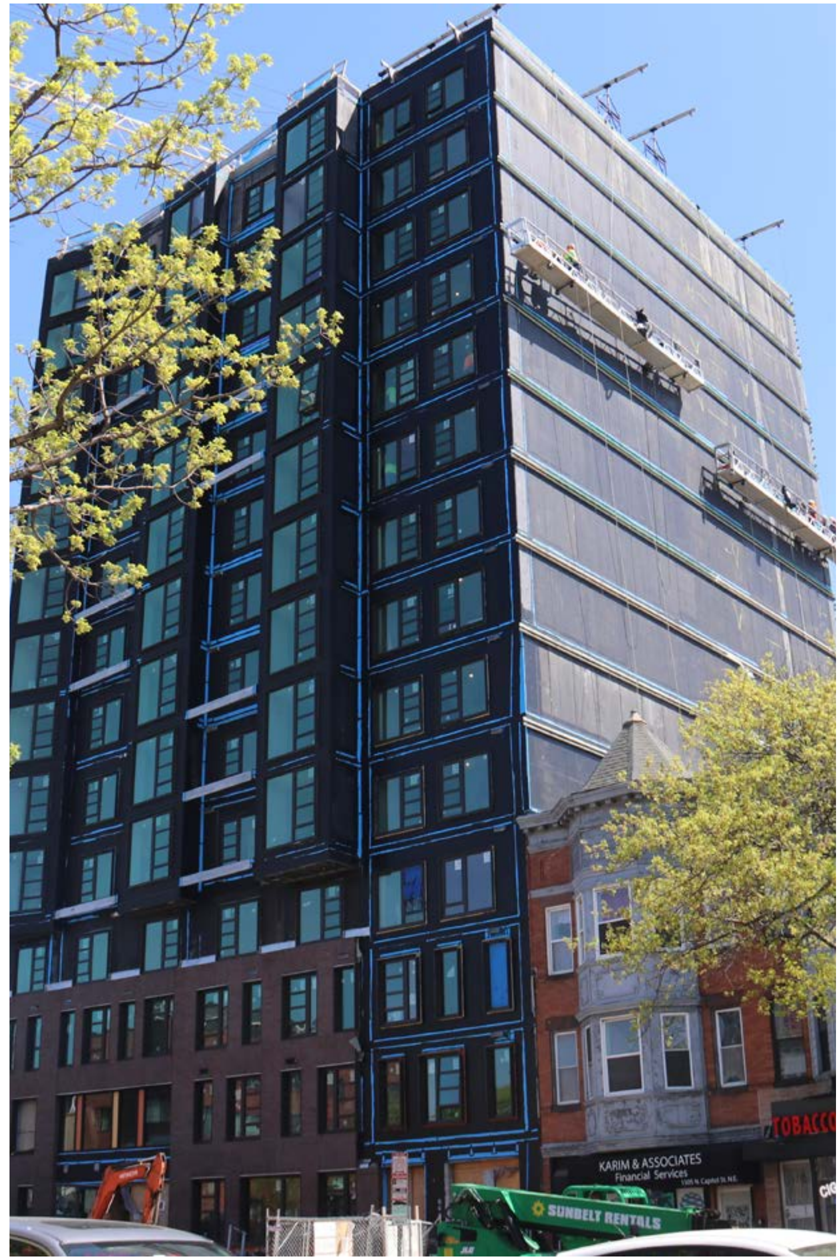
- An **Arkansas** scoring matrix indicates that a project can receive points for exceeding the 30-year minimum term, up to a maximum of 10 points (out of 100) for projects that commit to perpetual affordability. However, the HTF Allocation Plan indicates that Arkansas awarded 10 points if a project has a 35-year affordability period, with no reference to perpetual affordability.

- **Minnesota** awarded nine points (out of 286) if a project has a 50-year affordability period and eight points for 40 years.

- **New York** awarded up to 15 points (out of 100) for an affordability period up to 50 years.

- **Louisianna** awarded seven points (out of 100) for a 45-year affordability period, six points for 40 years, and five points for 35 years.

Willapa Center, PSH 13 units for formerly homeless families with children, Community Frameworks, Raymond, WA



Roberts Residences, PSH homeless, So Others Might Eat (SOME), Washington, DC

The Entwine, seniors, 24 PSH homeless, Up Housing, Washington, DC

- **Rhode Island** awarded up to five points (out of 130) for affordability periods in 10-year increments greater than 30 years: three points if the affordability period is 31 to 40 years, four points if 41 to 50 years, and five points if 51 or more years.

- **Wyoming** awarded up to 35 points (out of 494) for affordability periods greater than 30 years, up to 55 years: five points if 35 years, 10 points if 40 years, 17 points if 45 years, and 35 points if 55 years.

- 40 years: **Idaho** (two points out of 114), **Oklahoma** (five points out of 57) and **South Dakota** (30 points out of 940).

- Greater than 35 years: **Connecticut** (10 points out of 120).

- 35 years: **Alabama** (five points out of 105), **Mississippi** (five points out of 100).

- Greater than 30 years: **New Hampshire** (five points out of 115, only for Supportive Housing Set-Aside projects – not for 9% LIHTC projects), **New Jersey** (three points out of 100), **New Mexico** (five points out of 115), **North Dakota** (one point out of 168), and **Ohio** (10 points out of 50). **Arizona** applications "might receive points in scoring" if greater than 30 years.

Other incentives for affordability periods greater than 30 years include:

- **Hawai'i** and its subrecipients, as well as **Kansas**, gave "priority" to applications with an affordability period greater than 30 years.

- **Colorado** ranked an extended affordability period as only a fourth level of funding priority.

McCormick Crossing, General occupancy, Woda Cooper Companies, Sisterville, WV

MAXIMUM AMOUNT OF 2020 HOUSING TRUST FUND PER PROJECT

According to their HTF Allocation Plans or RFPs/NOFAs, 19 states established maximum amounts of HTF assistance per project. Eight states had maximums greater than $1 million: Pennsylvania ($1,200,000), Alabama ($1,350,000), Mississippi ($1,500,000), New Hampshire ($1,500,000, for its Supportive Services Set-Aside program), North Carolina ($1,500,00 for its Integrated Supportive Housing program), Ohio ($3 million for its 4% LIHTC Bond Gap Financing program), Texas ($3,000,000), and California ($20 million). Five states had $1 million-per-project maximums: Arkansas, Massachusetts, New Jersey, Oklahoma, and Utah. Maine and Tennessee had $900,000 maximums. Ohio's cap was $750,000 if a project did not seek LIHTC. Virginia's maximum was $800,000 per special needs project; otherwise, the cap was $700,000. South Dakota had a $600,000 maximum, Indiana had a $500,000 maximum, and New Mexico's maximum for LIHTC-financed projects was $400,000.

Edison School Apartments and Townhomes, 63 units for seniors, 12 units for families, adaptive reuse + new construction, Gorman and Company, Milwaukee, WI

Edison School Apartments and Townhomes, 63 units for seniors, 12 units for families, adaptive reuse + new construction, Gorman and Company, Milwaukee, WI

CONCLUSION

In 2020, the fifth year of HTF implementation, states appear to have maintained the course set in 2016. States continued to use most of their HTF resources (66%) to target projects that will serve people experiencing homelessness, people with disabilities, elderly people, or other special needs populations. Even in projects that did not target special needs populations, a surprising number of HTF-assisted projects (76) included three or more bedrooms to serve large households, a segment of the ELI population that has difficulty finding affordable housing. States also continued to synchronize the process of awarding HTF funds with their long-standing processes for awarding resources from other programs to affordable housing projects.

Most of the 2020 HTF allocation – $198 million (72%) – was used to construct new affordable housing units. Another $20 million was used for adaptive reuse projects, creating more affordable housing in properties previously used for non-housing purposes. In addition, although reported to HUD as "rehabilitation," NLIHC research showed that another five projects used $3.9 million to also create new affordable housing. Meanwhile, $52.6 million in HTF was used to preserve existing affordable housing, helping to ensure that this stock does not revert to market-rate housing. Of that $52.6 million, $23.5 million was used to help preserve earlier federal investment in affordable housing through HUD's Project-Based Section 8, Section 202, and Section 18 programs, as well as USDA's RD Section 515 program.

Woodside Prairie, supportive housing for adults with autism, Impact Seven, Grafton, WI

Superior View Cottages, general occupancy, Wisconsin Partnership for Housing Development and Commonwealth Development Corporation, Ashland, WI

The HTF remains an essential source of gap financing, used in conjunction with the HOME Investment Partnerships Program (HOME), the Federal Home Loan Banks' Affordable Housing Program (AHP), and other state affordable housing programs, including state or local Housing Trust Funds. The national HTF was used as gap financing for 167 projects also using the Low-Income Housing Tax Credit (LIHTC) program's equity investments in 2020, meaning that at least some units in LIHTC projects will serve extremely low-income households. It is interesting to note that 46 projects in 23 states did not rely on LIHTC equity; in these cases, state policies tended to use HTF strategically for smaller projects not conducive to the LIHTC process.

This 2020 report repeats NLIHC's qualitative review of each state's 2019 HTF Allocation Plan, which found that 30 states do not provide adequate HTF information in a manner that could inform the general public about the HTF and the factors the state uses to award HTF to projects. Most HTF Allocation Plans were written for developers seeking HTF funds. This report also repeats an additional qualitative review of each state's 2024 website, which found that 18 states did not have a hyperlink to their HTF program, and that other states' websites required guessing which other webpages to use to find references to the HTF. In general, NLIHC found that most states must improve their websites so that the general public can be aware of and well-informed about the HTF and states' use of HTF allocations.

Greenway Cottages, general occupancy, Wisconsin Partnership for Housing Development and Commonwealth Development Corporation, Mosinee, WI

Cody Senior Apartments, seniors, American Covenant Senior Housing Foundation Cody, WY

APPENDICES

APPENDIX A: STATE POLICIES AND PRACTICES FOR TARGETING SPECIAL NEEDS POPULATIONS

As indicated by information provided by states in their 2020 HTF Allocation Plans, Annual Action Plans, or application materials such as Requests for Proposals (RFPs) or Notices of Funding Availability (NOFAs), some states have established policies, set-asides, or competitive points for using HTF funds to provide affordable housing for people with various special needs. This appendix highlights states with such policies or set-asides.

PEOPLE EXPERIENCING HOMELESSNESS

Alaska can award one point (out of 236) if an applicant gives a preference to a household experiencing homelessness.

Anchorage can award three points (out of 150).

Arizona's website has a "2019-2020 NOFA: Supportive Housing Developments for Persons who are Homeless," which requires projects to reserve at least 50% of a project's units for households experiencing homelessness. None of Arizona's 2020 projects served people experiencing homelessness.

Arkansas can award 10 points (out of 100).

California devoted its HTF allocations from 2018 through 2020 to the state's Housing for Healthy California (HHC) pilot program. Consequently, HTF was limited to projects providing permanent supportive housing (PSH) for people experiencing chronic homelessness who were deemed "High-cost Health Users."

California had a number of **threshold requirements**. Proposed projects must use Housing First practices and demonstrate integration of the target population with the general public. California will not fund more than 49% of the units in a project that has more than 20 units. A Project Team must: collectively have experience with at least two PSH projects or at least two affordable rental housing projects within the last five years; a Lead Service Provider must have three or more years' experience serving people experiencing homelessness or chronically homelessness (the "Target Population"); and a Property Manager must have three or more years' experience serving the Target Population in supportive housing.

California had a detailed set of **project selection criteria**, including many pertaining to PSH. Out of 150 possible points:

A. Development Team Experience

1. Developer Experience (10 points maximum)

Applications were scored based on the number of affordable rental housing developments completed by the project developer over the past five years, including supportive housing projects completed in the last three years serving persons similar to the Target Population. Two points could be awarded for each completed development up to a maximum of 10 points.

2. Applicant Ownership and Operations Experience (five points maximum)

One-half point could be awarded for each affordable housing project, and one point could be awarded for each supportive housing project, up to a maximum of five points.

3. Property Manager Experience (five points maximum)

a. Applications were scored based on the number of affordable and supportive housing developments managed by the designated property management agent at the time of application. One-half point could be awarded for each affordable housing development, and one point could be awarded for each supportive housing development, up to a maximum of five points.

b. Points were awarded for supportive housing developments that had been in operation for at least two years with units restricted to people experiencing homelessness.

4. Lead Service Provider Experience (15 points maximum)

Points were awarded for experience in the last five years providing comprehensive case management and tenancy support to people experiencing homelessness, and for demonstrated expertise working with the Target Population. Points could be awarded for the following:

Years of experience in permanent supportive housing (3 points maximum)

i. One to two years (1 point)

ii. Three to four years (2 points)

iii. Five years or more (3 points)

Number of projects or contracts in permanent supportive housing (3 points maximum)

i. One to two projects (1 point)

ii. Three to four projects (2 points)

iii. Five or more projects (3 points)

Years of experience serving the Target Population (3 points maximum)

i. One to two years (1 point)

ii. Three to four years (2 points)

iii. Five years or more (3 points)

Experience providing comprehensive case management, where members of the Target Population were at least 20% of the Lead Service Provider's clients during the years for which points were sought in any of the following (two points for either of the following):

i. PSH restricted to members of the Target Population; or

ii. PSH not restricted to members of the Target Population, with documented experience providing homeless services with documented retention rates of at least 85% after 12 months.

B. Supportive Housing (25 points maximum)

To receive any points in this category, a minimum of 5% of total project units must be restricted as supportive housing. Applications were scored based on the percentage of total project units restricted as supportive housing: points range from five points if 5% of the total units were restricted to supportive housing, up to 25 points, increasing in 5% increments up to projects with 30% of the units restricted to supportive housing.

C. Quality of Supportive Services Plan (seven points maximum)

- Appropriateness for the Target Population (two points)
- Having a service delivery model tailored to people experiencing homelessness impacted with one or more chronic health or behavioral health conditions (three points)
- The accessibility of services, considering whether services would be on-site or in close proximity to the project, including the hours services would be available (two points)
- Adherence to Housing First principles (3 points)
- The levels of linkages with local systems for ending homelessness and community-based healthcare resources for members of the Target Population (five points)

Colorado's first priority for HTF funding is for projects that provide affordable, community-based supportive housing for people with disabilities or other special needs. The HTF Allocation Plan states that this priority aligns with Colorado's priority need for "housing assistance for the homeless." A webpage states that applicants must set aside at least 25% of a project's total units for special needs housing in order to qualify for HTF funding priority.

Connecticut provides eight points (out of 120) if a project has or can secure PBVs for 10% to 20% of a project's total units for households experiencing homelessness, and five points for those with 5% to 10% of units serving this population.

Delaware's HTF Allocation Plan indicates that 20% of Delaware's HTF allocation will be reserved for PSH projects, with a priority for chronically homeless people with mental health disabilities or substance abuse, or people experiencing chronic homelessness, or people with disabilities particularly if they are at high risk of homelessness or institutionalization. For 2020, that 20% amounted to $600,000. The 2020 NOFA indicates that applications will get preference if they provide PSH for the above populations. Elsewhere, the NOFA states that priority points will be given for projects serving people experiencing chronic homelessness who have mental health disabilities or substance abuse disorder; however, eligible populations can also include people experiencing chronic homelessness, or people with disabilities particularly if they are high risk of homelessness or institutionalization. The priority points are some unspecified portion of a 30-point category (out of 100 possible points). Delaware will prioritize providing new rental assistance for projects serving people with mental health disabilities who are at risk of homelessness or institutionalization.

The **District of Columbia** requires 5% of the units in an HTF project to be for permanent supportive housing for people experiencing homelessness.

Florida's HTF Allocation Plan gives "priority" to the use of HTF for developments that commit to integrate a small number of HTF-assisted units serving households with income equal to or less than 22% AMI who have special needs or who are experiencing homelessness. Florida requires applicants for HTF funding for general occupancy to commit to participate in Florida's "Link Strategy," which requires applicants to work with at least one "Special Needs Household Referral Agency" operating in the project's county. The referral agency will refer for occupancy in an HTF-assisted unit, people who are experiencing homelessness or who are at-risk of homelessness, as well as people with other special needs, such as people with disabilities, domestic violence survivors, or youth aging out of foster care. These HTF-assisted units are targeted to households with income equal to or less than 22% AMI. Only three or four HTF-assisted units are provided per project.

Illinois issues a Request for Applications (RFA) for PSH funded by a variety of state programs as well as the HTF. Projects applying for funding through the RFA must be disability-neutral and must have a minimum of 50% of total units affordable at or less than 30% AMI for supportive housing populations. In addition, at least 10% of the units must be reserved for households referred by the Illinois Statewide Referral Network (SRN) who have income equal to or less than 30% AMI and who are experiencing or at risk of homelessness, or are experiencing or at risk of institutionalization, or are headed by someone living with a disability. Illinois can award five points (out of 100) to projects that will have more than 10% SRN units up to 20% SRN units, and 10 points for those with more than 20% SRN units. An additional 10 points can be awarded if 100% of a project's units have Universal Design features (seven points if 50%-99% have Universal Design features). This Illinois RFA is limited to projects that do not seek LIHTC and that will have 40 or fewer units.

Indiana's HTF Application Policy for 2020 states that all of its 2020 HTF allocation was to be used for PSH for people experiencing homelessness. Projects must also have intensive service programs that have a direct impact on reducing homelessness through the Housing First model.

Iowa can award 10 points (out of 76).

Maine's RFP indicates that an application can receive four points (up to 20 points out of 100) for each unit that will serve either people experiencing chronic homelessness or people who have been living in a homeless shelter for 180 days or more out of the last 365 days.

Massachusetts' 2020 HTF Allocation Plan declares that the state is strongly committed to the development of housing with services for special needs populations. It also states that Massachusetts prioritized HTF funds for projects that provide service-enriched housing and housing for homeless families and individuals. The 2020 NOFA indicates that the state will give preference to projects that intend to create PSH units for individuals or families who face multiple barriers to securing and maintaining permanent housing. Barriers include disability, multiple emergency shelter placements, prior evictions, poor rent history, and poor credit. The NOFA states that if an applicant for HTF assistance requests and receives state rent assistance through the Massachusetts Rental Voucher Program (MRVP), the state will also provide up to $1,500 per unit per year for support services. The populations targeted for HTF/MRVP assistance include families or individuals experiencing homelessness, unaccompanied homeless youth, frail seniors with service needs, people recovering from substance abuse, and veterans.

Minnesota can provide 37 points (out of 286) to projects with an unspecified number of units targeted to people experiencing homelessness.

Mississippi prioritizes addressing homelessness in its Consolidated Plan and intends to use HTF funds to support strategies to end chronic homelessness and to serve special needs populations. These groups include people with disabilities and people with HIV/AIDS. According to the HTF Allocation Plan and "2020 HTF Application Guide," HTF-assisted units must be designated Special Needs Housing. Applications will be scored based on how well they propose to meet four priority housing needs, one of which is to prevent or reduce the number of people experiencing homelessness. One of Mississippi's threshold criteria is to meet at least one of three special needs categories, the percentage of units assigned to housing for people experiencing homelessness, people with disabilities, and/or people released from incarceration. Applications can receive five points (out of 100) based on the percentage of HTF-designated units greater than 10% for people with serious mental illness, people with disabilities, people released from incarceration, homeless elderly people, or youth aging out of foster care. Applicants can also receive 15 points if the development contracts with a service provider or hires staff to deliver services for special needs populations. Applicants must commit to providing a minimum of two community services.

Missouri has two Set-Aside Preferences, one of which is a "Vulnerable Persons Priority" which gives preference to projects that commit to set aside at least 10% of total units for people who are homeless, including domestic violence survivors, or youth transitioning from foster care.

Nebraska set aside $1.5 million of its HTF allocation for a "Permanent Housing Set Aside" for projects serving people who are experiencing homelessness, who are at risk of homelessness, or who have some other special need.

New Hampshire set aside $1,250,000 of its HTF allocation for an RFP for projects not seeking LIHTC that will provide PSH, giving priority to people experiencing homelessness. The RFP can provide 20 points (out of 115) for projects prioritizing people experiencing homelessness, plus up to five points for the quality of a supportive service plan. The state has 50 PBVs that it can award to these HTF-assisted units. The balance of New Hampshire's HTF is tied to projects also using 9% LIHTC which follow the state's QAP. For these joint HTF/9% LIHTC applications, 15 points (out of 230) can be awarded if 100% of the units are for households experiencing or at risk of homelessness or include a veteran.

Rhode Island HTF applicants serving special needs populations including those experiencing homelessness or at risk of homelessness "could" share some portion of 30 points (out of 130) among three Tier 1 priority categories.

Vermont requires all applicants for any multifamily assistance to describe plans and tools in place to achieve Vermont's goal of making at least 15% of the units in their portfolio available for people experiencing homelessness, including those with special needs who require service support and rental assistance to secure and maintain their homes. Regarding the "merits" of an application (a factor in the federal regulations), Vermont asks applicants whether a project will serve households experiencing homelessness and whether it will have services designed to meet their needs.

Wisconsin can award 20 points (out of 100) for projects with at least 25% of the units serving people experiencing homelessness and/or veterans requiring supportive services.

PEOPLE WITH DISABILITIES

Alabama can provide 25 points (out of 105) to projects targeted to people with physical or mental disabilities. Alabama can provide an additional 10 points if the project also has a strategy for addressing the specific needs of the target population.

Alaska can provide eight points (out of 236) to projects based on the proportion of total units for people with a physical disability.

Arkansas can provide 10 points (out of 100).

Colorado's first priority for HTF funding is for projects that provide affordable, community-based supportive housing for people with disabilities or other special needs. The HTF Allocation Plan states that this priority aligns with Colorado's priority need for "housing assistance for the homeless." A webpage states that applicants must set aside at least 25% of a project's total units for special needs housing in order to qualify for HTF funding priority.

Delaware's HTF Allocation Plan indicates that 20% of Delaware's HTF allocation will be reserved for PSH projects, with a priority for chronically homeless people with mental health disabilities or substance abuse, or people experiencing chronic homelessness, or people with disabilities particularly if they are at high risk of homelessness or institutionalization. For 2020, that 20% amounted to $600,000. The 2020 NOFA indicates that applications will get preference if they provide PSH for the above populations. Elsewhere, the NOFA states that priority points will be given for projects serving people experiencing chronic homelessness who have mental health disabilities or substance abuse disorder; however, eligible populations can also include people experiencing chronic homelessness, or people with disabilities particularly if they are at high risk of homelessness or institutionalization. The priority points are some unspecified portion of a 30-point category (out of 100 possible points). Delaware will prioritize providing new rental assistance for projects serving people with mental health disabilities who are at risk of homelessness or institutionalization.

Idaho's HTF Allocation Plan states a preference for projects targeted to people with disabilities and can award three points (out of 115) if a project has at least three units for people with a disability.

Illinois issues a Request for Applications (RFA) for PSH funded by a variety of state programs as well as the HTF. Projects applying for funding through the RFA must be disability-neutral and must have a minimum of 50% of total units affordable at or less than 30% AMI for supportive housing populations. In addition, at least 10% of the units must be reserved for households referred by the Illinois Statewide Referral Network (SRN) who have income equal to or less than 30% AMI and who are experiencing or at risk of homelessness, or are experiencing or at risk of institutionalization, or are headed by someone living with a disability. Illinois can award five points (out of 100) to projects that will have more than 10% SRN units up to 20% SRN units, and 10 points for those with more than 20% SRN units. An additional 10 points can be awarded if 100% of a project's units have Universal Design features (seven points if 50%-99% have Universal Design features). This Illinois RFA is limited to projects that do not seek LIHTC and that will have 40 or fewer units.

Indiana can award five points (out of 148) if a project exceeds federal Section 504 requirements (by an unspecified amount), plus an additional five points if an unspecified percentage of a project's units have Universal Design features.

Iowa can award two points (out of 76) if 10% of a project's units are fully accessible, five points if 25% of the units are fully accessible, and 10 points if 50% of the units are fully accessible.

Minnesota can award 19 points (out of 286) to projects with an unspecified number of units targeted to people with a disability. A project can receive an additional three points for an unspecified number of units with Universal Design features.

Mississippi prioritizes addressing homelessness in its Consolidated Plan and intends to use HTF funds to support strategies to end chronic homelessness and to serve special needs populations. These groups include people with disabilities and people with HIV/AIDS. According to the HTF Allocation Plan and "2020 HTF Application Guide," HTF-assisted units must be designated Special Needs Housing. Applications will be scored based on how well they propose to meet four priority housing needs, one of which is to expand access to permanent housing with support services for people with serious mental illness. One of Mississippi's threshold criteria is to meet at least one of three special needs categories: the percentage of units assigned to housing for people experiencing homelessness, people with disabilities, and/or people released from incarceration. Applications can receive five points (out of 100) based on the percentage of HTF-designated units greater than 10% for people with serious mental illness, people with disabilities, people released from incarceration, homeless elderly people, or youth aging out of foster care. Applicants can also receive 15 points if the development contracts with a service provider or hires staff to deliver services for special needs populations. Applicants must commit to providing a minimum of two community services.

Missouri requires all new construction projects to be designed and constructed following Universal Design principles. Missouri has two Set-Aside Preferences, one of which is a "Special Needs Priority" that gives preference to projects that commit to set aside at least 10% of total units for people with physical, emotional, or mental impairment, or who are diagnosed with mental illness or people with a developmental disability.

For **New Hampshire's** 9% LIHTC set-aside, 20 points (out of 230) can be awarded to existing properties if an applicant enters into a Section 811 Supportive Housing for Persons with Disabilities contract and commits to 31 or more units for a household with a person with a disability. A range of fewer points can be awarded based on the number of Section 811 units in a project, for example 14 points if a project will have 21-30 Section 811 units, down to two points if only one to five units will have with Section 811 rent assistance.

North Carolina requires all LIHTC applications to set aside a minimum of 10% of total units for people with disabilities as integrated PSH units. These units are referred to as "Targeted Units." A project can opt to reserve up to 20% of units as Targeted Units, which are eligible for the state-funded project-based rental assistance program known as Key Rental Assistance. The Key Program provides operating assistance designed to ensure affordability for households with income as low as Supplemental Security Income (approximately 20% AMI) The Key Program also provides services and supports for the tenants it assists. The Targeted Units policy is part of the state's *Olmstead* settlement[3], as is the state's Transition to Community Living Vouchers (TCLV) program, which helps people move from congregate settings into integrated PSH.

North Dakota can provide nine points (out of 168) for properties if 20% of the units meet minimum Universal Design features, six points if 15%, and three points if 10%. In addition, one additional point (up to three points) can be awarded for each Universal Design unit that has two or more bedrooms.

Oklahoma can award five points (out of 57) if a project will have visitability features such as a zero-step or ramp entry, door openings at least 32 inches wide, and one wheelchair accessible bathroom on the main floor.

Oregon can award up to five points (out of 100) to applications that include the use of Section 811 Rental Assistance for Persons with Disabilities.

Pennsylvania requires all newly constructed townhouse or elevator projects, as well as all ground floor units in walk-up apartment buildings, to have 100% visitability features such as a zero-step or ramp entry, door openings at least 32 inches wide, and one wheelchair accessible bathroom on the main floor. Rehabilitation projects should strive for 100% visitability, but at least 25% of the units must have visitability features. In addition, Pennsylvania can award 10 points (out of 204) to projects that have twice as many accessible units as are required by federal Section 504 regulations.

South Dakota can provide up to 30 points (out of 940) for projects with 20% to 25% of the units assisted with Section 811 Rental Assistance for Persons with Disabilities. In addition, a project can receive up to 15 points if 15% to 20% of the units are fully accessible above the federal Section 504 minimums. Further, another 15 points can be awarded if a project has seven Universal Design principles in at least 25% of all non-Section 504 units.

Tennessee will provide an unspecified competitive edge to a project that will set aside 20% or more of its units for people with disabilities.

[1]In the Olmstead decision, the U.S. Supreme Court found that the institutionalization of persons with disabilities who were ready to return to the community was in violation of Title II of the "Americans with Disabilities Act" (ADA). State and local governments are required to "administer services, programs, and activities in the most integrated setting appropriate to the needs of the qualified individuals with disabilities."

Vermont identifies among many factors that indicate the "merit" of a project (a term called for by the HTF regulations) housing that is accessible or adaptable for people with disabilities and service-enriched housing serving people with disabilities.

SENIORS

Alaska can provide eight points (out of 236) if a project primarily serves seniors.

Idaho's HTF Allocation Plan states a preference for projects targeted to seniors and can provide three points (out of 115) if a project has at least three units for seniors.

Kansas "may" give priority to developments that target elderly people, people with disabilities, or households experiencing homelessness. The Kansas LIHTC Qualified Allocation Plan (QAP) provides 20 points (out of 310) if 100% of a project's units will be occupied by people with special needs or people who are elderly.

Louisiana can provide six points (out of 100) if 100% of a project's units will house seniors.

Minnesota can provide eight points (out of 286) for an unspecified percentage of units for seniors.

New Hampshire can provide five points (out of 230) if a service-enriched, age-restricted project that is assisted with the state's HTF/9% LIHTC option, provides (or contracts for) onsite health clinics.

Rhode Island indicates that a proposed senior project could share 20 points (out of 130) among three Tier 2 priorities.

Vermont's 2020 HTF Allocation Plan has two features among a long list of potential "merits" the state will consider when reviewing an application: a project that will produce affordable senior units in regions where market analysis identifies a shortage of units for low-income seniors, and a project that will provide service-enriched housing that allows seniors to age in place.

VETERANS

Alabama can offer 25 points (out of 105) if a project is targeted to veterans and can offer an additional 15 points if the project has a strategy for addressing housing problems faced by ELI veterans.

Alaska can offer two points (out of 236) if a project has a preference for housing veterans.

Arkansas' HTF Allocation Plan has a preference for projects serving ELI veterans who have a special need. Also, Arkansas can offer 10 points (out of 100) if a project serving ELI veterans is close to a veteran medical facility. A NOFA indicates that there must be at least four units for veterans in a project to be considered for the preference.

Michigan will give "additional consideration" to a project that will create units for veterans.

Missouri will give preference to applications offering significant services tailored to veterans' needs.

New Hampshire can provide 15 points (out of 230) if a project that is assisted with the state's HTF/9% LIHTC option has 100% of its units for veterans experiencing housing instability and provides those veterans with supportive services. A project could receive an additional five points if 10% or more of these units are age-restricted.

Wisconsin can provide 20 points (out of 100) to properties designed to serve veterans who require supportive services.

MIXED OR UNSPECIFIED SPECIAL NEEDS

Alabama provides preferences for applications that meet the special needs of veterans, people experiencing homelessness, or people with physical or mental disabilities. In addition, Alabama provides 25 points (out of 100) for projects that target extremely low-income veterans or extremely low-income people with physical or mental disabilities. Applicants that provide historical evidence of having served – and that also describe a strategy for addressing the housing problems of – ELI veterans can earn an additional 15 points; for those serving non-veterans with physical or mental disabilities, an extra 10 points may be awarded.

Alaska prioritizes applications addressing the housing needs of people experiencing homelessness or people with physical or mental disabilities. Alaska has a threshold requiring projects that will have 20 or more units to set aside 5% of total units for these special needs populations. Furthermore, the state can award eight points (out of 236) if additional units (beyond the required 5%) up to 50% of a project's units are targeted to people with special needs, and three points if a project incorporates substantive social services.

Colorado's first priority for HTF funding is for projects that provide affordable, community-based supportive housing for people with disabilities or other special needs. The HTF Allocation Plan states that this priority aligns with Colorado's priority need for "housing assistance for the homeless." A webpage states that applicants must set aside at least 25% of a project's total units for special needs housing in order to qualify for HTF funding priority.

Delaware's HTF Allocation Plan indicates that 20% of Delaware's HTF allocation will be reserved for PSH projects with a priority for chronically homeless persons with mental health disabilities or substance abuse, or people experiencing chronic homelessness, or people with disabilities particularly if they are at high risk of homelessness or institutionalization. For 2020, that 20% amounted to $600,000. The 2020 NOFA indicates that applications will get preference if they provide PSH for the above populations. Elsewhere, the NOFA states that priority points will be given for projects serving people experiencing chronic homelessness who have mental health disabilities or substance abuse disorder; however, eligible populations can also include people experiencing chronic homelessness, or people with disabilities particularly if they are at high risk of homelessness or institutionalization. The priority points are some unspecified portion of a 30-point category (out of 100 possible points). Delaware will prioritize providing new rental assistance for projects serving people with mental health disabilities who are at risk of homelessness or institutionalization.

Florida's Allocation Plan expresses a "preference" for households with income equal to or less than 22% AMI. The Allocation Plan also gives "priority" to the use of HTF for developments that commit to integrate a small number of HTF-assisted units serving households with income equal to or less than 22% AMI who have special needs or who are experiencing homelessness. Florida requires applicants for HTF funding for general occupancy to commit to participate in Florida's "Link Strategy," which requires applicants to work with at least one "Special Needs Household Referral Agency" operating in the project's county. The referral agency will refer for occupancy in an HTF-assisted unit, people who are experiencing homelessness or who are at-risk of homelessness, as well as people with other special needs, such as people with disabilities, domestic violence survivors, or youth aging out of foster care. These HTF-assisted units are targeted to households with income equal to or less than 22% AMI. Only three or four HTF-assisted units are provided per project.

Illinois issues a Request for Applications (RFA) for PSH funded by a variety of state programs as well as the HTF. Projects applying for funding through the RFA must be disability-neutral and must have a minimum of 50% of total units affordable at or less than 30% AMI for supportive housing populations. In addition, at least 10% of the units must be reserved for households referred by the Illinois Statewide Referral Network (SRN) who have income equal to or less than 30% AMI and who are experiencing or at risk of homelessness, or are experiencing or at risk of institutionalization, or are headed by someone living with a disability. Illinois can award five points (out of 100) to projects that will have more than 10% SRN units up to 20% SRN units, and 10 points for those with more than 20% SRN units. An additional 10 points can be awarded if 100% of a project's units have Universal Design features (seven points if 50%-99% have Universal Design features). This Illinois RFA is limited to projects that do not seek LIHTC and that will have 40 or fewer units.

Kansas "may" give priority to developments that target elderly people, people with disabilities, or households experiencing homelessness. The Kansas LIHTC Qualified Allocation Plan (QAP) provides 20 points (out of 310) if 100% of a project's units will be occupied by people with special needs or people who are elderly.

Louisiana can provide points for projects that will provide supportive services for one of four special needs populations: people experiencing homelessness, people with disabilities, single-parent households, or veterans. Points range from three points (out of 100) if 10% of the units serve a special needs household, four points for 20%, and five points for 30%.

Maine can award three points (up to 20 points out of 100 points) for each unit meeting the specific housing needs of "vulnerable" populations.

Massachusetts' 2020 HTF Allocation Plan declares that the state is strongly committed to the development of housing with services for special needs populations. It also states that Massachusetts prioritized HTF funds for projects that provide service-enriched housing and housing for homeless families and individuals. The 2020 NOFA indicates that the state will give preference to projects that intend to create PSH units for individuals or families who face multiple barriers to securing and maintaining permanent housing. Barriers include disability, multiple emergency shelter placements, prior evictions, poor rent history, and poor credit. The NOFA states that if an applicant for HTF assistance requests and receives state rent assistance through the Massachusetts Rental Voucher Program (MRVP), the state will also provide up to $1,500 per unit per year for support services. The populations targeted for HTF/ MRVP assistance include families or individuals experiencing homelessness, unaccompanied homeless youth, frail seniors with service needs, people recovering from substance abuse, and veterans.

Mississippi's 2020 HTF Allocation Plan prioritizes homelessness and intends to use HTF to support strategies to end chronic homelessness and serve special needs populations, including people with mental illness, people with physical disabilities, and people with HIV/AIDS. Mississippi's Allocation Plan and "2020 HTF Application Guide" require HTF-assisted units to be designated for Special Needs Housing and lists three special needs categories: people with disabilities, people experiencing homelessness, and people released from incarceration. Applications can receive five points (out of 100) based on the percentage of HTF-designated units greater than 10% for people with serious mental illness, people with disabilities, people released from incarceration, homeless elderly people, or youth aging out of foster care. Applicants can also receive 15 points if the development contracts with a service provider or hires staff to deliver services for special needs populations. Applicants must commit to providing a minimum of two community services.

Missouri prioritizes projects housing people with special needs in combination with services that help stabilize them once they are living in place. Missouri "strongly encourages" developments that provide housing opportunities for people with special needs and has a preference for applications offering significant services tailored to special needs populations. Missouri has two Set-Aside Preferences, a "Special Needs Priority" and a "Vulnerable Persons Priority." The "Special Needs Priority" gives preference to projects that commit to set aside at least 10% of total units for people with physical, emotional, or mental impairment, or who are diagnosed with mental illness or people with a developmental disability. The "Vulnerable Persons Priority" gives preference to projects that commit to set aside at least 10% of total units for people who are homeless, including domestic violence survivors, or youth transitioning from foster care.

Montana's HTF Allocation Plan states that HTF funds will be used to increase and preserve the supply of rental housing for people experiencing homelessness, people with a disability, elderly people, and other disadvantaged ELI populations.

Nebraska set aside $1.5 million of its HTF allocation for a "Permanent Housing Set Aside" for projects serving people who are experiencing homelessness, who are at risk of homelessness, or who have some other special need.

New Jersey requires 100% of HTF-assisted units to serve special needs populations and indicates that applicants for HTF assistance should have a service plan detailing how services will be provided to targeted special needs populations.

New Mexico can provide up to 20 points (out of 115) based on the percentage of HTF units targeted to any special needs population: 20 points if 50% of HTF units are targeted to special needs populations, 16 points if 40% of HTF units are targeted, 12 points if 30% of HTF units are targeted, eight points if 20% of HTF units are targeted, and four points if 10% of HTF units are targeted. Special needs populations include: elderly or frail elderly people, people with severe mental illness, people with physical disabilities, people with addictions, people with HIV/AIDS, domestic violence survivors, and people experiencing homelessness.

New York projects that propose to provide PSH to a variety of special needs populations in integrated housing settings are competing with 11 other factors for some portion of up to 20 points (out of 100). Neither the HTF Allocation Plan nor a state "term sheet" identify specific special needs populations.

North Dakota can award up to 10 points (out of 168) to projects committed to supporting tenants who have special needs by providing Tenant Support Coordinators.

Oklahoma can provide 10 points (out of 57) to a project that dedicates at least 10% of total units for special needs populations. An additional five points can be awarded for applications providing access to supportive services. Special needs populations include: people experiencing homelessness, youth aging out of foster care, veterans, and people with mental or physical disabilities.

Pennsylvania can provide five points (out of 204) to projects that provide supportive services for residents, plus an additional five points if there is sufficient funding for 15 years for those supportive services.

Rhode Island HTF applications serving special needs populations with supportive services could share some portion of 30 points (out of 130) among three Tier 1 categories.

South Dakota has a $600,000 set-aside for special needs projects and can award up to 40 points (out of 940) for projects that provide on-site services. Special needs populations include: people experiencing homelessness, people with physical or mental disabilities, people with developmental disabilities, and elderly people.

Utah can award two points (out of an unknown total) for each unit set aside for residents who are experiencing homelessness, who have a disability, or who are elderly.

Vermont gives priority to projects that target at least 20% of total units to special needs populations.

Virginia gives (unspecified) scoring preference to PSH projects targeted to special needs populations.

Wisconsin can award 20 points (out of 100) for projects with at least 25% of the units serving people experiencing homelessness, people with disabilities, and/or veterans requiring supportive services.

PERMANENT SUPPORTIVE HOUSING

Alaska can award three points (out of 236) if an application proposes substantive, service-enriched housing through hard set-aside units for people experiencing homelessness or who have a disability.

Arizona can award 10 points (out of 90) depending on a developer's past experience providing PSH; five or more projects placed in service (10 points), four projects (eight points), three projects (six points), two projects (four points), and one project (two points).

California devoted its HTF allocations from 2018 through 2020 to the state's Housing for Healthy California (HHC) pilot program. Consequently, HTF was limited to projects providing PSH for people experiencing chronic homelessness who were deemed "High-cost Health Users."

California had a number of **threshold requirements**. Proposed projects must use Housing First practices and demonstrate integration of the target population with the general public. California will not fund more than 49% of the units in a project that has more than 20 units. A Project Team must: collectively have experience with at least two PSH projects or at least two affordable rental housing projects within the last five years; a Lead Service Provider must have three or more years' experience serving people experiencing homelessness or chronic homelessness (the "Target Population"); and a Property Manager must have three or more years' experience serving the Target Population in supportive housing.

California had a detailed set of **project selection criteria**, including many pertaining to PSH. Out of 150 possible points:

A. Development Team Experience

1. Developer Experience (10 points maximum)

Applications were scored based on the number of affordable rental housing developments completed by the project developer over the past five years, including supportive housing projects completed in the last three years serving persons similar to the Target Population. Two points could be awarded for each completed development up to a maximum of 10 points.

2. Applicant Ownership and Operations Experience (five points maximum)

One-half point could be awarded for each affordable housing project, and one point could be awarded for each supportive housing project, up to a maximum of five points.

3. Property Manager Experience (five points maximum)

a. Applications were scored based on the number of affordable and supportive housing developments managed by the designated property management agent at the time of application. One-half point could be awarded for each affordable housing development, and one point could be awarded for each supportive housing development, up to a maximum of five points.

b. Points were awarded for supportive housing developments that had been in operation for at least two years with units restricted to people experiencing homelessness.

4. Lead Service Provider Experience (15 points maximum)

Points were awarded for experience in the last five years providing comprehensive case management and tenancy support to people experiencing homelessness, and for demonstrated expertise working with the Target Population. Points could be awarded for the following:

Years of experience in permanent supportive housing (3 points maximum)

i. One to two years (1 point)

ii. Three to four years (2 points)

iii. Five years or more (3 points)

Number of projects or contracts in permanent supportive housing (3 points maximum)

i. One to two projects (1 point)

ii. Three to four projects (2 points)

iii. Five or more projects (3 points)

Years of experience serving the Target Population (3 points maximum)

i. One to two years (1 point)

ii. Three to four years (2 points)

iii. Five years or more (3 points)

Experience providing comprehensive case management, where members of the Target Population were at least 20% of the Lead Service Provider's clients during the years for which points were sought in any of the following (two points for either of the following):

i. PSH restricted to members of the Target Population; or

ii. PSH not restricted to members of the Target Population, with documented experience providing homeless services with documented retention rates of at least 85% after 12 months.

B. Supportive Housing (25 points maximum)

To receive any points in this category, a minimum of 5% of total project units must be restricted as supportive housing. Applications were scored based on the percentage of total project units restricted as supportive housing: points range from five points if 5% of the total units were restricted to supportive housing, up to 25 points, increasing in 5% increments up to projects with 30% of the units restricted to supportive housing

C. Quality of Supportive Services Plan (seven points maximum)

- Appropriateness for the Target Population (two points)
- Having a service delivery model tailored to people experiencing homelessness impacted with one or more chronic health or behavioral health conditions (three points)
- The accessibility of services, considering whether services would be on-site or in close proximity to the project, including the hours services would be available (two points)
- Adherence to Housing First principles (3 points)
- The levels of linkages with local systems for ending homelessness and community-based healthcare resources for members of the Target Population (five points).

Colorado's first priority for HTF funding is for projects that provide affordable, community-based supportive housing for people with disabilities or other special needs. The HTF Allocation Plan states that this priority aligns with Colorado's priority need for "housing assistance for the homeless." A webpage states that Supportive Housing developments must set aside at least 25% of a project's total units for special needs housing in order to qualify for HTF funding priority.

Connecticut states that PSH is a priority use for its HTF funds.

Delaware's HTF Allocation Plan indicates that 20% of Delaware's HTF allocation will be reserved for PSH projects, with a priority for chronically homeless people with mental health disabilities or substance abuse, or people experiencing chronic homelessness, or people with disabilities particularly if they are at high risk of homelessness or institutionalization.

For 2020, that 20% amounted to $600,000. The 2020 NOFA indicates that applications will get preference if they provide PSH for the above populations. Elsewhere, the NOFA states that priority points will be given for projects serving people experiencing chronic homelessness who have mental health disabilities or substance abuse disorder; however, eligible populations can also include people experiencing chronic homelessness, or people with disabilities particularly if they are at high risk of homelessness or institutionalization. The priority points are some unspecified portion of a 30-point category (out of 100 possible points). Delaware will prioritize providing new rental assistance for projects serving people with mental health disabilities who are at risk of homelessness or institutionalization.

The **District of Columbia** requires 5% of units in an HTF project to be for permanent supportive housing for people experiencing homelessness.

Illinois issues a Request for Applications (RFA) for PSH funded by a variety of state programs as well as the HTF. Projects applying for funding through the RFA must be disability-neutral and must have a minimum of 50% of total units affordable at or less than 30% AMI for supportive housing populations. In addition, at least 10% of the units must be reserved for households referred by the Illinois Statewide Referral Network (SRN) who have income equal to or less than 30% AMI and who are experiencing or at risk of homelessness, or are experiencing or at risk of institutionalization, or are headed by someone living with a disability. Illinois can award five points (out of 100) to projects that will have more than 10% SRN units up to 20% SRN units, and 10 points for those with more than 20% SRN units. An additional 10 points can be awarded if 100% of a project's units have Universal Design features (seven points if 50%-99% have Universal Design features). This Illinois RFA is limited to projects that do not seek LIHTC and that will have 40 or fewer units.

Indiana's 2020 HTF Application Policy states that all of its 2020 HTF allocation was to be for affordable rental housing specifically for supportive housing for people experiencing homelessness. HTF would only be awarded to projects that have completed the state's 2020 Permanent Supportive Housing Institute. This requires a project to include intensive service programs that have a direct impact on reducing homelessness using the Housing First model.

Massachusetts' 2020 HTF Allocation Plan declares that the state is strongly committed to the development of housing with services for special needs populations. It also states that Massachusetts prioritized HTF funds for projects that provide service-enriched housing and housing for homeless families and individuals. The 2020 NOFA indicates that the state will give preference to projects that intend to create PSH units for individuals or families who face multiple barriers to securing and maintaining permanent housing. Barriers include disability, multiple emergency shelter placements, prior evictions, poor rent history, and poor credit. The NOFA states that if an applicant for HTF assistance requests and receives state rent assistance through the Massachusetts Rental Voucher Program (MRVP), the state will also provide up to $1,500 per unit per year for support services. The populations targeted for HTF/

MRVP assistance include families or individuals experiencing homelessness, unaccompanied homeless youth, frail seniors with service needs, people recovering from substance abuse, and veterans.

Nebraska set aside $1.5 million of its HTF allocation for a "Permanent Housing Set Aside" for projects serving people who are experiencing homelessness, who are at risk of homelessness, or who have some other special need.

New Hampshire sets aside $1,250,000 of its HTF allocation for an RFP for projects not seeking LIHTC that will provide PSH for people experiencing homelessness. The RFP can provide 20 points (out of 115) for projects prioritizing people experiencing homelessness, plus up to five points for the quality of a supportive service plan. The state has 50 PBVs that it can award to these HTF-assisted units.

New York can provide some portion of 20 points (out of 100 points and among 11 other competing factors) to projects that provide PSH to a variety of special needs populations in integrated housing settings. Neither the HTF Allocation Plan nor a state "term sheet" identify specific special needs populations.

North Carolina requires all LIHTC applications to set aside a minimum of 10% of total units for people with disabilities as integrated PSH units. These units are referred to as "Targeted Units." A project can opt to reserve up to 20% of units as Targeted Units, which are eligible for the state-funded project-based rental assistance program known as Key Rental Assistance. The Key Program provides operating assistance designed to ensure affordability for households with income as low as Supplemental Security Income level income (approximately 20% AMI). The Key Program also provides services and supports for the tenants it assists. The Targeted Units policy is part of the state's *Olmstead* settlement[2], as are the state's "Transition to Community Living Vouchers (TCLV) program which helps people move from congregate settings into integrated PSH.

Virginia can provide an unspecified preference for PSH projects targeted to special needs populations.

[2]In the Olmstead decision, the U.S. Supreme Court found that the institutionalization of persons with disabilities who were ready to return to the community was in violation of Title II of the "Americans with Disabilities Act" (ADA). State and local governments are required to "administer services, programs, and activities in the most integrated setting appropriate to the needs of the qualified individuals with disabilities."

APPENDIX B: ASSESSMENT OF THE QUALITY OF 2019 HOUSING TRUST FUND ALLOCATION PLANS AND ANNUAL ACTION PLANS

The HTF statute and regulations require State Designated Entities (SDEs) administering the HTF to prepare an annual HTF Allocation Plan for public review and comment and attach this plan to a state's Consolidated Plan Annual Action Plan. The HTF Allocation Plan must describe: how a state will distribute its HTF funds, including how it will use the funds to address its priority housing needs; the criteria the state will use to select projects to fund; and other factors involved in the HTF process. NLIHC thinks that HTF Allocation Plans should be easy for the general public to read, and that they should provide detailed information about a state's priorities for providing affordable housing to extremely low-income renters, especially regarding whether they plan to target limited HTF resources to certain special needs populations.

The Office of Affordable Housing Programs (OAHP) in HUD's Office of Community Planning and Development (CPD) issued a template that SDEs can use to draft an HTF Allocation Plan that is included as a component of a state's Consolidated Plan Annual Action Plan. This HTF component is included at the end of most Annual Action Plans at "AP-90 Program Specific Requirements," under "Housing Trust Fund (HTF)." In addition to using the OAHP template incorporated into an Annual Action Plan, some states develop a more detailed, stand-alone HTF Allocation Plan. These HTF Allocation Plans tend to be easier to read and generally much more informative.

The OAHP template (starting on page 10 at "Allocation Plan Requirements") overemphasizes features that are unimportant to advocates, such as an applicant organization's development experience and technical capacity, financial capacity, familiarity with federal programs, ability to obligate funds, and the extent to which a project will make use of non-federal sources of funding. Most HTF Allocation Plans, whether simply following the template or stand-alone documents, are written in a very developer-oriented manner, rather than in a way that explains the HTF and a state's priorities to a lay audience.

What is important to NLIHC, and presumably to other advocates and advocacy groups, is: information about priorities for housing specific populations in HTF-assisted units (e.g., homeless people, disabled people, frail elderly, large families, survivors of domestic violence, youth existing foster care, and people reentering the community from incarceration); the types of projects (e.g., new construction, preservation, or adaptive reuse); and whether projects are located in areas of opportunity, have access to public transportation, and promote energy-efficiency.

With this in mind, NLIHC carried out a qualitative review of state SDEs' 2019 HTF Allocation Plans/Annual Action Plans to assess the extent to which they were informative to non-developer audiences, assigning letter grades on the basis of its assessments. NLIHC did not repeat such an assessment for this 2020 HTF report, assuming that during the 2020 pandemic year, major changes were not undertaken as SDEs shifted staff to designing and implementing temporary federal and state programs to address the housing impacts of the pandemic.

However, NLIHC did observe slight differences between 2019 and 2020 HTF Allocation Plans, but NLIHC did not undertake a qualitative assessment similar to that carried out for the 2019 HTF report. NLIHC also recognizes that states might have made improvements to their HTF Allocation Plans and supporting materials since 2020; nonetheless, this report reiterates the 2019 qualitative assessment assuming that most SDEs have not made significant improvements to date.

NLIHC assigned an "A" letter grade to the HTF Allocation Plans of Alabama, Florida, Massachusetts, Mississippi, North Dakota, South Dakota, Vermont, and Wisconsin. These HTF Allocation Plans generally offered very good explanations of the HTF program and/or explanations of the targeting provisions NLIHC cares about.

NLIHC assigned a "B" letter grade to the HTF Allocation Plans of 12 states plus two Hawai'i subrecipients: Alaska, District of Columbia, Indiana, Louisiana, Maryland, Missouri, New Hampshire, New Jersey, New Mexico, North Carolina, Ohio, Utah, and the City and County of Honolulu and the County of Hawai'i[2]. These HTF Allocation Plans might be a bit too oriented toward developers or have other shortcomings that prevent them from receiving an "A" letter grade, but they have other positive qualities, such as being very reader-friendly, providing good general information about the HTF, touching on many characteristics NLIHC values (e.g., detailing the specific subpopulations a state prioritizes, or indicating points, set-asides, or preferences for such populations), or explaining how a state's HTF program is tied to other federal or state programs.

NLIHC assigned a "C" letter grade to the HTF Allocation Plans of 21 states plus two Hawai'i subrecipients (Kaua'i and Maui). These plans met the minimum requirements of the OAHP template, "AP-90 Program Specific Requirements," under "Housing Trust Fund (HTF)." Letter grade "C" was assigned to: Arkansas, California, Colorado, Connecticut, Delaware, Hawai'i, Idaho, Indiana, Iowa, Kaua'i, Kansas, Kentucky, Maine, Maui, Nebraska, New York, Oklahoma, Oregon, Rhode Island, South Carolina, Tennessee, Virginia, and West Virginia.

NLIHC assigned a "D" letter grade to the HTF Allocation Plans of eight states because they were less informative than those receiving a "C" letter grade or because they were exceedingly developer-oriented. The eight states receiving a "D" grade were: Arizona, Georgia, Illinois, Michigan, Minnesota, Pennsylvania, Washington, and Wyoming. One state only obliquely indicated that its HTF funds will be exclusively available to permanent supportive housing projects. One state too frequently responded to a template prompt by referring to its Low Income Housing Tax Credit (LIHTC) Qualified Allocation Plan (QAP) and to a federal HTF regulation citation. Two other states responded to the template prompts by referring to an attachment to the Annual Action Plan that was not attached and which NLIHC could not recover. Even if the attachment had been found, the general public should not be required to toggle between an HTF Allocation Plan and a separate document to gather vital information.

NLIHC assigned an "F" letter grade for the HTF Allocation Plans of Montana, Nevada, and Texas as well as the Alaska subrecipient Anchorage. Montana's HTF Allocation Plan was too developer-oriented and, though lengthy, was far too general to be helpful. The Texas HTF Allocation Plan, which was very difficult to track down on the state's website, was extremely developer-oriented. Nevada did not have an HTF Allocation Plan or even an Annual Action Plan on its website. The state's Annual Action Plan posted on CPD's website was of very poor quality. Anchorage Alaska's Annual Action Plan was far too developer-oriented, having the nature of an application for HTF funds.

(*Because the County of Hawai'i was not in the State of Hawai'i's 2019 HTF rotation, its Annual Action Plan just repeatedly indicated "Not Applicable" to the prompts in the OAHP HTF template, providing no information about the HTF in general. Therefore, for the purpose of this appendix, NLIHC reviewed the County's 2018 HTF Allocation Plan.)

APPENDIX C: ASSESSMENT OF HOUSING TRUST FUND INFORMATION ON STATES' 2024 WEBSITES

To be effective advocates for how their state uses the HTF, residents must be aware that the HTF exists, have basic knowledge about the program, and know how their state administers the HTF, particularly regarding their state's use of priority allocation factors. NLIHC reviewed each state SDE's 2024 websites to discern how readily someone might be able to find information about the HTF in their state. NLIHC did not repeat such a review as it drafted this 2020 report during the first four months of 2025; therefore, it is possible that the websites of some SDEs could have changed…for better or for worse.

Eighteen states and two state subrecipients did not even include a hyperlink for their HTF program on their webpages. These states and subrecipients included: Anchorage (an Alaska subrecipient), Arizona, Connecticut, Delaware, Georgia, Illinois, Kansas, Kaua'i (a Hawai'i subrecipient), Kentucky, Maine, Michigan, New Hampshire, New York, North Carolina, Oregon, Pennsylvania, Texas, Utah, and Wyoming. Finding an HTF hyperlink for Minnesota, West Virginia, and Wisconsin requires making guesses while navigating through several webpages.

Including an HTF hyperlink is only the most basic requirement. Any linked page must also contain adequate information about the HTF. Most SDE websites have a section that can clue people in to where information about the HTF might be found. (Such pages have titles such as "Housing," "Multifamily rental housing," "Housing development," "Developer financing," or simply "Programs".) In some instances, finding information about the HTF (or even a reference to the HTF) is challenging, requiring one to navigate several layers into a website and make guesses about which options might include information about the HTF. Even when information is located, however, NLIHC has found that it is often written for developers, not the general public or advocates seeking to influence the type of development to be undertaken and the population type to be housed with HTF funds.

NLIHC also carried out a qualitative review of SDE websites to determine whether they included current HTF Allocation Plans, past HTF Allocation Plans, and/or Consolidated Plan Annual Action Plans containing the key elements of an HTF Allocation Plan. In Annual Action Plans, an HTF Allocation Plan can be found toward the end of the document in a section entitled, "AP-90 Program Specific Requirements," under "Housing Trust Fund (HTF)." NLIHC also noted whether SDE webpages had basic descriptions of the HTF, as well as other helpful information, such as HTF-related Requests for Proposals (RFPs)/ Notices of Fund Availability (NOFAs), application guides, and scoring sheets.

Based on its review of these webpages, NLIHC assigned an "A" to seven states and two subrecipients:

- Alabama's page has a seven-sentence HTF description, excellent access to current and past HTF Allocation Plans, and good access to summaries of projects awarded HTF funds each year.
- Hawai'i has a seven-sentence HTF description, easy to find links to all HTF Allocation Plans up to 2022, and a separate link to 2023 and 2024 Annual Action Plan versions of the HTF Allocation Plan.
    - Maui, a Hawai'i subrecipient, has a very detailed HTF description, a 2024 HTF proposal package, the county's 2023 Annual Action Plan version of the HTF Allocation Plan, and the state HTF Allocation Plans for the years 2018 to 2022.
    - The County of Hawai'i, a subrecipient of the state of Hawai'i, has a very detailed HTF description, a 2024 HTF proposal package, the county's 2023 Annual Action Plan version of the HTF Allocation Plan, and the state HTF Allocation Plans for the years 2018 to 2022.
- Maryland has a four-sentence HTF description with Allocation Plans from 2016 to 2023 on its HTF webpage and the 2024 Annual Action Plan version of the HTF Allocation Plan on its Consolidated Plan webpage.
- Mississippi has a good, thirteen-sentence HTF description with HTF Allocation Plans from 2018 to 2024, recent NOFAs, current year scoring criteria, and funding awards from 2018 to 2023. Mississippi also has a readily identifiable link to Annual Action Plans from 2019 to 2024.
- North Dakota has a three-sentence HTF description, a link to all HTF Allocation Plans, and previous years' HTF awards. There is also a separate link to Annual Action Plans for 2021 to 2024.
- Ohio has a six-sentence HTF description plus additional background information from NLIHC, HTF Allocation Plans for 2016 to 2023 (but not for 2024), as well as a separate link for all Annual Action Plan versions of the HTF Allocation Plan.
- Virginia has a four-sentence HTF description and explains that all HTF funding goes through the state's "Affordable and Special Needs Housing" (ASNH) program, which is linked. There is also a separate link to Annual Action Plans from 2018 to 2024.

NLIHC assigned a "B" to four states:

- Alaska has a basic, six-sentence HTF description and easy access to a separate link for past and current Annual Action Plan versions of the HTF Allocation Plan.
- California has a not-so-informative four-sentence HTF description, as well as NOFAs, FAQs, Guidelines, and award lists for the period 2018 to 2021 when the HTF was used for the state's Housing for a Healthy California program. California also has NOFAs and guidelines for the period 2022 to 2024. There is a separate link for Annual Action Plan versions of the HTF Allocation Plan from 2020 to 2024.
- Indiana has a one-sentence HTF description and very detailed "Application Policy" documents for 2019 through 2023, but not 2024. A separate link has Annual Action Plans from 2016 through 2023 (but not 2024), which have appendices containing detailed "HTF Policy" documents.
- Vermont has a two-sentence HTF description with a link to a Handbook with Quick References and a link to only the 2022 HTF Allocation Plan. A separate Consolidated Plan page has HTF Allocation Plan versions of the HTF Allocation Plan from 2019 through 2024, as well as Annual Action Plans from 2019 through 2024.

NLIHC assigned a "C" to eight states:

- Arkansas has a basic, six-sentence HTF description. A separate Arkansas Development Finance Authority "Forms" webpage has an HTF Operations Manual, Program Guidelines, and a NOFA with more basic information. NLIHC was not able to find Annual Action Plans.
- Iowa's SDE is the Iowa Finance Authority. Its webpage has a basic seven-sentence HTF description, developer-oriented Application Guides, application webinar slides for 2022, 2023, and 2024, as well projects awarded HTF funds from 2017 through 2022. Iowa's Economic Development Department has Annual Action Plan versions of the HTF Allocation Plan from 2020 through 2024.
- New Jersey has a basic HTF description and a link to a 16-page "Program Guidelines and Procedures" document that is similar to an HTF Allocation Plan. However, links to past years' HTF Allocation Plans were not available, nor could NLIHC locate New Jersey's Annual Action Plans.
- New Mexico has a good, twelve-sentence HTF description, the 2022 NOFA, and a scoring worksheet. However, there were no HTF Allocation Plans. A separate Annual Action Plans page has Annual Action Plan versions of the HTF Allocation Plan from 2013 through 2024.
- Oklahoma's SDE is the Oklahoma Housing Finance Agency. Its webpage has a basic seven-sentence HTF description, a developer-oriented "application package," and HTF awards made from 2018 through 2023. However, the webpage does not have any HTF Allocation Plans or links to Annual Action Plans. A separate website for the Department of Commerce has Annual Action Plan versions of the HTF Allocation Plan, but only for the years 2020 through 2024.
- South Carolina has a four-sentence HTF description and links to Annual Action Plan versions of the HTF Allocation Plan for the years 2020 through 2023 - but not 2024. The HTF page does not inform readers that the state devotes all its

HTF funds to the state's Small Rental Development Program (SRDP). A separate link for SRDP provides program materials for years 2018 through 2024.

- South Dakota has a good, 10-sentence HTF description, the 2024 HTF Allocation Plan, and a cumulative HTF awards list, as well as a link to an application. The site does not have past HTF Allocation Plans or a link to Annual Action Plans.
- Washington has a one sentence HTF description and a link to the 2023 Annual Action Plan version of the HTF Allocation Plan, but not one for 2024. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2016 through 2023 - but not for 2024.

NLIHC assigned a "D" to 13 states and two subrecipients:

- Delaware does not have an HTF description, and any reference to the HTF is not readily apparent. If one selects the "Supportive Housing" page and scrolls down, "Housing Trust Fund Permanent Supportive Housing (PSH)" appears. A link for the 2020 NHTF Allocation Plan provides the 2017 National Housing Trust Fund Allocation Plan. Another link provides NOFAs from the years 2018 through 2021. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2019 through 2024.
- The District of Columbia has a six-sentence HTF description and links to the 2019 and 2020 HTF Allocation Plans. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2016 through 2023.
- Idaho has a three-sentence HTF description and a link to the HOME page, which has more specific HTF-related information in "Annual Administrative Plans" for the years 2022, 2023, and 2024. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2021 through 2024.
- Among Hawai'i subrecipients for 2019:
  - Honolulu has an HTF hyperlink with a six-sentence HTF description. That page has no HTF Allocation Plan or Annual Action Plan. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2011 through 2024.
  - Kaua'i has a three-sentence HTF description and a link to the 2022 HTF Allocation Plan. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2016 through 2024.
- Louisiana has a seven-sentence, not-so-informative HTF description hinting that the HTF is associated with Permanent Supportive Housing (PSH) and might include Project-Based Vouchers. The Permanent Supportive Housing webpage does not mention the HTF. There is a link to the 2016 Annual Action Plan. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2020 through 2024.
- Massachusetts has a good, 12-sentence HTF description, the 2019 HTF Allocation Plan, and NOFAs for 2020 and 2021. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2016 through 2024.

- Minnesota has a four-sentence HTF description, but it can be found only after navigating through "Rental Housing"/"Housing Development and Capital Funding Programs"/"Capital Funding Programs" to arrive at the HOME and NHTF webpage, which has the 2023 HOME and NHTF Combined Program Guide. A separate link has the Annual Action Plan version of the HTF Allocation Plan for 2024.

- Missouri has a four-sentence HTF description and a link to LIHTC 9% and 4% NOFAs from 2017 through 2024, as well as projects awarded funding during those years, including HTF awards. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2021 through 2024.

- Montana has a 10-sentence, developer-oriented HTF description, application guidelines, and an application toolkit. There is no reference to an HTF Allocation Plan or Annual Action Plan. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2019 through 2024.

- Nebraska has a nine-sentence HTF description with a link to a developer application manual. There is no mention of an HTF Allocation Plan. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2015 through 2024.

- New York does not have an HTF hyperlink. Finding reference to the HTF is difficult; users must navigate through various program pages and guess which one might refer to the HTF. Upon selecting "Tax Exempt Bond and Subsidy Financing Information for HFA Affordable Rental Housing," a link for the "Fall 2023 HCR Federal Housing Trust Fund Term Sheet" provides a document basically equivalent to an HTF Allocation Plan. NLIHC could not locate a link for Annual Action Plans.

- Tennessee has a good, 11-sentence HTF description, with a detailed "National Housing Trust Fund Program Description" and NOFAs for 2022 and 2023. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2016 through 2022.

- West Virginia has a seven-sentence HTF description on an HTF page which is difficult to locate from the home page. The HTF page has a link to the 2024 Annual Action Plan version of the HTF Allocation Plan, as well as lists of projects awarded HTF funds from 2019 through 2023.

- Wisconsin has a two-sentence HTF description that is difficult to locate from the home page. From "Housing and Property Managers," if one selects "Housing Tax Credits," located along the right margin, there is a menu which has an HTF link. The HTF page provides contact information to request past HTF Allocation Plans. It also has a link with 2021 information, such as the Request for Applications, Scoring Criteria, and Application Checklist. The HTF page also lists the projects awarded HTF for 2021. The Division of Energy, Housing, and Community Development has a website with the Annual Action Plan versions of the HTF Allocation Plan for 2019 through 2024.

NLIHC assigned a "F" to 19 states and one state subrecipient:

- Anchorage, an Alaska subrecipient, does not have an HTF hyperlink, nor does it mention the HTF anywhere. A separate link has draft Annual Action Plans for 2018 through 2024.
- Arizona does not have an HTF hyperlink or description of the HTF. A separate link has only 2023 and 2024 draft Annual Action Plans, and on an archived page there are listed Annual Action Plans for 2018 and 2019.
- Colorado has a seven-sentence HTF description and a link to the 2016 HTF Allocation Plan. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2019 through 2024.
- Connecticut does not have an HTF hyperlink, and the HTF is not mentioned among the programs administered by the state. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2016 through 2023 (not for 2024).
- Florida has a good 14-sentence HTF description, but the HTF webpage does not link to the current HTF Allocation Plan. There is a link to the state's Request for Applications site, but without any hint as to which of the 17 RFAs might include HTF resources. NLIHC found it difficult to locate where Florida posts Annual Action Plans; they are found on the Department of Commerce website and are accessible only after delving through four layers of pages.
- Georgia does not have an HTF hyperlink, and the HTF is not included on the "All Programs" webpage. NLIHC found it difficult to locate Annual Action Plans; they are found five layers deep within "Safe and Affordable Housing."
- Illinois does not have an HTF hyperlink, and the HTF is not included among other programs and funding sources. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2018 through 2024. There is an oblique indication in the Annual Action Plans that HTF is targeted to Permanent Supportive Housing; the webpage of PSH does not mention HTF.
- Kansas does not have an HTF hyperlink, nor does it mention HTF, focusing instead on the HOME Program and 9% and 4% LIHTC. Furthermore, NLIHC could only find the 2018 Annual Action Plan and the 2019-2023 Consolidated Plan.
- Kentucky does not have an HTF hyperlink. Four layers down under "Multifamily Programs," there is only a link to the HUD HTF homepage. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2016 through 2024.
- Maine does not have an HTF hyperlink. To discover information about the HTF, users must navigate from "Multifamily Development" to "Open Programs," where there are eight programs listed. At "Supportive Housing Programs," the HTF is mentioned as a potential resource. After opening the link for "Current RFP," there is still no sign that HTF is a resource. Under "Older RFPs," the 2023 RFP also does not mention the HTF, but those starting with 2021 do mention the HTF. The 2017 through 2019 RFPs are titled "National Housing Trust Fund Request for Proposals." A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2016 through 2024.

- Michigan does not have an HTF hyperlink. From the homepage, the options under the prominent "Rental Developers" icon do not mention the HTF; however, selecting "Developers" from the less obvious menu at the top of the homepage does offer "Multifamily Direct Lending Programs." Scrolling down to "Parameters from Past Years," one finds links to HTF Allocation Plans from 2017 through 2020. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2016 through 2024.

- Nevada has an HTF link with a six-sentence description. However, there is no link to any HTF Allocation Plans or more detailed information about the HTF. Also, NLIHC could not locate a link for Annual Action Plans.

- New Hampshire does not have an HTF hyperlink. The "Other Financing Programs" page simply names the HTF without further information. A separate Consolidated Plan page does not have Annual Action Plans, just the 2021-2024 Consolidated Plan.

- North Carolina does not have an HTF hyperlink or a basic description. Reference to the HTF could only be found as the one-page Exhibit J of the LIHTC Qualified Allocation Plan. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2019 through 2024.

- Oregon does not have an HTF hyperlink and only has a three-sentence HTF description. The site does have a link to Annual Action Plan versions of the HTF Allocation Plan for the years 2020 through 2024.

- Pennsylvania does not have an HTF hyperlink and only has a one-sentence HTF description, along with HTF Allocation Plans for 2020, 2018, and 2016. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2014 through 2023 (not for 2024).

- Rhode Island has an HTF hyperlink but only a two-sentence HTF description. A separate link has only the 2022 Annual Action Plan version of the HTF Allocation Plan.

- Texas does not have an HTF hyperlink or an HTF description. If one knows that the HTF is included under the "Multifamily Direct Loan Program," one can navigate to this page but will find that it has only a link to the HTF regulations. A separate link has Annual Action Plan versions of the HTF Allocation Plan for the years 2014 through 2024.

- Utah does not have an HTF hyperlink and only has a one-sentence description under "Program Guidance and Rules" for the Olene Walker Housing Loan Fund. A separate link has the 2024 Annual Action Plan version of the HTF Allocation Plan.

- Wyoming does not have an HTF hyperlink. The HTF is indicated as one of the programs administered by the SDE on the "About Multifamily Development" page. The HTF is listed, along with HOME and 9% and 4% LIHTC on the 2025 Affordable Housing Allocation Plan, and there is a one-sentence HTF description in the 2024 Multifamily NOFA. The site does not have Annual Action Plan versions of the HTF Allocation Plan but merely the full Consolidated Plans for 2023-2027 and 2018-2022.

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