Memo To Members & Partners
A weekly newsletter from the National Low Income Housing Coalition

Volume 23, Issue 40
October 15, 2018

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U.S. Department of Homeland Security

'Public Charge' Draft Rule Formally Published in Federal Register

As anticipated (see *Memo* 10/9), the U.S. Department of Homeland Security (DHS) formally published its draft "public charge" rule in the *Federal Register* on October 10. Comments are due December 10.

Noncitizens seeking admission to the U.S., noncitizens applying for lawful permanent resident status (green card), or those seeking an extension of, or changes to, their non-immigrant status are subject to a review to determine whether they are or might become a "public charge" – someone primarily dependent on the government for subsistence.

Currently, three programs are covered under the public charge policy, TANF, SSI, and emergency-Medicaid. The proposed rule would add to the definition of public charge the Section 8 Housing Choice Voucher, Section 8 Project-Based Rental Assistance, and Public Housing programs, as well as the Supplemental Nutrition Assistance Program (SNAP, or food stamps), Non-emergency Medicaid, the Medicare Part D Low Income Subsidy, and institutionalization for long-term care at government expense. DHS is also considering adding the Children's Health Insurance Program (CHIP) to the list.

The proposed rule would adopt a new income threshold that households would have to exceed to avoid being considered a public charge: an immigrant would have to earn at least 125% of the federal poverty level. The proposed rule would also negatively consider applicants with limited English proficiency (LEP) or with physical or mental health conditions that could affect their ability to work, attend school, or care for themselves.

The Protecting Immigrant Families (PIF) Campaign, co-chaired by the Center for Law and Social Policy (CLASP) and the National Immigration Law Center (NILC), have launched a new website that includes a partner toolkit comment FAQ, analysis of the proposed changes to the public charge rule, and a comprehensive promotional toolkit for Facebook, Twitter, and Instagram that has sample graphics and text for social media and email.

PIF released a statement opposing the proposed public charge rule signed by more than 1,500 organizations, including NLIHC, across all fifty states and DC.

The PIF website is at: https://protectingimmigrantfamilies.org

The proposed rule is at: https://bit.ly/2RGm2rw

An easier-to-read, but 434-page version is at: https://bit.ly/2IRcsOD

HUD

HUD Publishes MTW Waivers Appendix, NLIHC's Preliminary Assessment Reveals Serious Issues

The Appendix that was missing from the modified Moving to Work (MTW) Demonstration Operations Notice published on October 5 (see *Memo*, 10/9) was included in a "Republication" on October 11. The Operations Notice establishes requirements for implementing the MTW demonstration for public housing agencies (PHAs) applying for one of the 100 new MTW slots. Comments are due November 26. Based on an initial assessment of the Appendix, NLIHC has serious concerns.

The “Consolidated Appropriations Act of 2016” authorized HUD to expand the MTW demonstration to an additional 100 high performing PHAs over a seven-year period. PHAs will be added to the MTW demonstration in annual cohorts, each of which will be overseen by a research advisory committee to ensure the demonstrations are evaluated with rigorous research protocols, quantitative analysis, and comparisons to control groups. Each year’s cohort of MTW sites will be directed by HUD to test one specific policy change.

As *Memo* reported last week, a major change in the current Operations Notice from that published for comment on January 23, 2017, is that HUD has removed what that 2017 draft called “Conditional Waivers,” which would have required HUD approval (listed in Appendix B of the draft), as well as “General Waivers” (listed in Appendix A of the draft). In their place, HUD will have “MTW Waivers” and “Cohort Waivers.” In addition, a PHA can seek HUD approval for “Agency-Specific Waivers” seeking to waive a statutory or regulatory requirement or to implement an activity not listed in the Appendix.

The newly available Appendix lists the available waivers and associated activities of the new “MTW Waivers” category. The Appendix also includes “safe harbors” that identify additional requirements a PHA must follow to carry out MTW activities without needing HUD approval.

Based on a preliminary review of the Appendix, under the new “MTW Waivers” category, MTW PHAs will be able to use harmful practices without having to secure HUD approval, practices previously in the “Conditional Waivers” category that did require HUD approval. For example, any MTW PHA could impose work requirements, term limits of 4 years, stepped rents (which are term limits by another name), minimum rents of $250 per month for non-elderly/non-disabled households and $100 per month for elderly and disabled households, rent burdens of 35% for non-elderly/non-disabled and 30% for elderly and disabled households, and rent burdens at initial occupancy of more than 40% - even for elderly and disabled households.

In short, many MTW PHAs could undertake these and other potentially harmful policies without the rigorous evaluation required by the expansion statute. And, because new MTW PHAs have to be part of one of the four cohorts, it is unclear how evaluators will discern whether one or more “MTW Waivers” have clouded a given cohort’s policy.

The Operations Notice indicates that the first cohort will evaluate “The Impact of MTW Flexibility on Small and Medium PHAs.” The initial cohort will be limited to PHAs with fewer than 1,000 public housing units and vouchers combined. During a meeting of the MTW Research Advisory Committee on October 10, HUD indicated that approximately 30 small PHAs would be selected for this cohort. A PIH Notice requesting PHAs to apply for MTW status as part of the first cohort is expected to be issued next week. Such a Selection Notice will describe the requirements to participate in that cohort.

A second cohort will evaluate rent reform policies. That Selection Notice is in Departmental clearance and is expected to be issued later in 2018. Currently, HUD is anticipating accepting ten PHAs for that cohort. A third cohort will evaluate work requirements, and a fourth will evaluate incentives to increase landlord participation in the voucher program.

NLIHC will continue to carefully review and assess the latest Operations Notice.

The republished MTW Operations Notice, complete with the Appendix, is at: https://bit.ly/2yAWOSD

An easier-to-read version is at: https://bit.ly/2EfrbnM

HUD Sends Section 3 Streamlined Proposed Rule to OIRA for Review

HUD has sent to the Office of Information and Regulatory Affairs (OIRA) at the Office of Management and Budget (OMB) a proposed rule to streamline the Section 3 requirements. The listing on an OIRA webpage does not provide any detail other than the title of a proposed rule pending OIRA review: "Streamlining the 'Section 3' Requirements for Creating Economic Opportunities for Low- and Very Low-Income Persons and Eligible Businesses (FR-6085)."

The purpose of Section 3 of the Housing and Urban Development Act of 1968 is to ensure that when HUD funds are used to assist housing and community development projects, preference for some of the new jobs, training, and contracting opportunities created by the funding should go to low income people and to the businesses that hire them "to the greatest extent feasible."

When federal agencies such as HUD propose regulations, they must send them to OIRA for review. OIRA responds with comments to HUD, and HUD takes the comments into consideration. Although HUD does not have to abide by OIRA suggestions, given the power wielded by OMB, agencies generally accept them. When the OIRA review is completed, HUD eventually publishes the OIRA-approved proposed or final rule in the *Federal Register*.

HUD's Spring Regulatory Agenda, posted on May 9, 2018, by OIRA (see *Memo*, 5/14), removed the 2015 proposed rule for Section 3 developed by the Obama administration with significant input from advocates. In its place, the administration's Spring Regulatory Agenda provided a substantially different description of a proposed Section 3 rule.

One sentence was of particular potential concern: "The rule proposes to align and integrate oversight and reporting by eliminating complaint and compliance review provisions in favor of program-specific mechanisms, thereby reducing burden." The other new descriptive text was:

> "The rule also proposes opportunities to encourage the training of low- and very low-income persons to ensure the availability of a skilled workforce once the construction or renovation begins. Finally, it would establish thresholds at levels at which federal assistance effectively generates new economic opportunities, provide a mechanism to adjust thresholds over time, align requirements to typical recipients' business practices to reduce burden, and clarify the obligations of covered recipient agencies."

NLIHC will continue monitoring the OIRA site and include updates in *Memo* as the proposed rule moves through the system and when a proposed rule is published for comment in the *Federal Register.*

The Section 3 listing on the OIRA webpage is at: https://bit.ly/2PnIQuJ

Information about Section 3 is on page 7-38 of NLIHC's *2018 Advocates' Guide.*

Information about the federal regulatory process is on page 2-7 of NLIHC's *2018 Advocates' Guide.*

HUD Offers "URA Overview," the First in an Eight-Part Series

HUD will offer "URA the HUD Way," a series of eight web-based modular trainings providing basic information and resources to HUD grantees and funding recipients on the Uniform Relocation Act (URA) requirements for HUD-funded projects. Module 1, "URA Overview," is currently available. These training modules are distinct from the animated videos discussed in last week's *Memo to Members and Partners* (see *Memo*, 10/9).

Module 2 will provide an overview of another federal law known as Section 104(d). Section 104(d) was introduced by former Representative Barney Frank in response to displacement caused by jurisdictions' use of Community Development Block Grant (CDBG) funds. The enacted law provides better compensation for renters displaced by CDBG or HOME projects.

The other modules planned are:

- Module 3: URA Planning and Budgeting
- Module 4: URA Real Property Acquisition
- Module 5: URA Residential Relocation
- Module 6: URA Nonresidential Relocation
- Module 7: URA Temporary Relocation
- Module 8: Recordkeeping, Monitoring, and Corrective Action

The URA the HUD Way website has additional URA resources at: https://bit.ly/2PmKXim

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Disaster Housing Recovery

Housing Recovery Updates Related to the 2018 Disasters – October 15, 2018

The following is a review of housing recovery developments related to Hurricanes Florence and Michael since last week's *Memo to Members and Partners* (for the article in last week's *Memo*, see 10/9). NLIHC also posts this information at On the Home Front.

General

The NLIHC-led Disaster Housing Recovery Coalition (DHRC) of more than 800 national, state and local organizations shared its *Top Priorities for Any Disaster Recovery Package* with Congress as it prepares the next disaster relief package for the communities impacted by Hurricanes Florence and Michael. The document, developed by the DHRC Policy Working Group, includes twelve specific recommendations to Congress on how to enhance the federal housing recovery response following natural disasters. They include:

- Provide robust disaster recovery funding and housing assistance for people with the greatest needs;
- Require all damaged or destroyed federally subsidized affordable rental homes to be replaced on a one-for-one basis;
- Ensure that federal disaster recovery dollars are used equitably to address housing and infrastructure needs, as well as the needs of homeowners, renters, and people experiencing homelessness;
- Support innovative, cost-effective housing solutions;
- Promote contracting and jobs for low income disaster survivors and businesses; and
- Prepare for the next disaster by authorizing long-term disaster recovery legislation.

Hurricane Michael

NLIHC compiled initial estimates of the impact Hurricane Michael will have on low income communities. About 20% of the region lives below the poverty line, and as many as 80,000 families lacked transportation to evacuate. Nearly 130,000 affordable rental homes, 43,000 of them subsidized, and over 200,000 mobile homes were in Hurricane Michael's path. Last year's storm season had already exacerbated the state's shortage of affordable housing.

Vice President Mike Pence and Secretary of Agriculture Sonny Perdue were briefed on October 11 on the potential impacts Hurricane Michael could have on rural communities. USDA has a number of resources available to farmers and rural communities following major disasters, including a disaster assistance discovery tool.

Hurricane Michael caused power outages and damage in Florida, Alabama, Georgia, and North and South Carolina. State governments issued state emergency declarations and worked with the Red Cross to open temporary shelters. The majority of the damage appears to have occurred in Florida and Georgia.

Florida

FEMA

President Trump issued a major disaster declaration for Florida (DR-4399) on October 11. Residents in five counties are eligible for Individual Assistance and Public Assistance: Bay, Franklin, Gulf, Taylor, and Wakulla. In addition to these five, Calhoun, Gadsden, Hamilton, Jackson, Jefferson, Leon, Liberty, Madison, Suwannee, and Taylor counties are eligible for Public Assistance (A-B). This declaration affords survivors and public and private organizations financial assistance to recover from the storm.

State Action

The Florida Department of Children and Families announced it would release SNAP benefits early in 11 counties to ensure low income families had resources to stock up on food before and after the storm.

The Florida Department of State issued a memorandum extending the voter registration deadline for any paper voter registration applications for the 2018 General Election relative to any Supervisor of Elections' offices closed on October 9.

Perspectives & Resources

Governor Scott activated the Florida Disaster Fund for people impacted by Hurricane Michael. This fund, administered by the Volunteer Florida Foundation, will support disaster relief organizations.

The Florida Division of Emergency Management is maintaining a list of open shelters.

About three-fourths of all residences in the impacted counties in the Florida Panhandle were built before 2000 when more stringent building codes were enacted in Florida. Additionally, about 22% of all occupied dwellings are mobile homes, which are particularly susceptible to damage during hurricanes.

Georgia

President Trump issued an emergency declaration for Georgia (EM-3406) on October 11. Providing assistance for state, tribal, and local governments for debris removal and emergency protective measures, the declaration covers 31 counties.

Hurricane Florence

An early analysis suggests that Low Income Housing Tax Credit (LIHTC) homes fared relatively well during Hurricane Florence, with only 397 of 18,000 units reported as offline several weeks after the storm. The North Carolina Housing Finance Agency reports another 37 properties are under construction or will soon start construction in the impacted areas. The South Carolina State Housing Finance and Development Authority has reported no serious damage to LIHTC properties.

Heavy rains and high winds from Hurricane Michael have set back some recovery efforts and increased the need for temporary housing in the Carolinas. Fortunately, Hurricane Michael spared much of North Carolina's eastern coast, which was greatly impacted by Hurricane Florence.

North Carolina

FEMA

According to a FEMA fact sheet about Direct Temporary Housing programs, FEMA is providing recreation vehicles (RVs) and manufactured housing units as temporary housing options for survivors in North Carolina. Currently, only nine counties are approved for Direct Housing assistance: Brunswick, Carteret, Columbus, Craven, Duplin, Jones, Onslow, Pender, and Robeson.

FEMA reports that 8,000 homeowners and almost 7,500 renters have received rental assistance from FEMA.

State Government

Governor Roy Cooper directed $25 million from the North Carolina Education Lottery Fund to speed repairs to public schools damaged during Hurricane Florence.

Governor Cooper also announced a budget for a long-term funding package for recovery efforts in response to an estimated $13 billion in damage caused by Hurricane Florence. His recommended recovery package totals $1.5 billion and includes $50 million for the Housing Finance Agency to address the shortage of affordable housing, $12 million for the Back@Home rapid rehousing program, and $176 million for a repair and rehabilitation fund. Governor Cooper is requesting the legislature make an initial down payment of $750 million when it returns for a special session this week.

Perspectives & Resources

The Red Cross reversed its decision to close a shelter on October 8 since it served as the only safe option for about 40 people. Many survivors are still unable to return to damaged homes, and some have been evicted because of the storm. Other shelters are also working to find homes for the remaining survivors as they prepare to close.

Families in Burgaw, a community in Pender County, NC, have no running water or electricity following severe damage to the majority of the community's homes.

Over 100 of the more than 300 housing units at the public housing complex Trent Court in New Bern, NC, are still uninhabitable. Local aldermen and public housing authority officials are working with HUD to receive emergency vouchers for displaced tenants.

Housing Recovery Updates Related to the 2017 Disasters– October 15, 2018

The following is a review of housing recovery developments related to Hurricanes Harvey, Irma, and Maria, and the California wildfires since last week's *Memo to Members and Partners* (for the article in last week's *Memo*, see 10/9). NLIHC also posts this information at On the Home Front.

HUD

- HUD Deputy Secretary Pam Patenaude discussed the department's role in disaster recovery in *HousingWire's* podcast *6 Questions with 6 HUD Executives*. Deputy Secretary Patenaude explained her dual role at HUD, where she splits her time between disaster recovery and policymaking. Regarding HUD's role in the recovery efforts following Hurricane Maria in Puerto Rico, she explained that over one quarter of a million people in Puerto Rico relied on HUD every day prior to the hurricane. HUD supports more than 50,000 public housing units on the island, 117,000 FHA-backed homeowners, 33,000 rental units under the Housing Choice Voucher program, and over 25,000 privately owned rental units in the Project-Based Section 8 program.

State Action

- The Texas Land Commissioner announced on October 8 that the Texas General Land Office (GLO) approved all nine Methods of Distribution (MODs) proposed by the regional Councils of Governments for Hurricane Harvey recovery. To review the approved MODs, visit Recovery.Texas.gov. The MODs have faced criticism from advocates, given the distribution of funds based solely on storm impact without taking into account how pre-existing community needs may have contributed to worse conditions. Learn more about the critiques from a blog by Texas Housers, an NLIHC state partner and DHRC member.
- The State of Florida released a draft of its Substantial Amendment to the Florida Disaster Recovery Action Plan for distributing Community Development Block Grant–Disaster Recovery (CDBG-DR) funds related to Hurricane Irma. HUD requirements are available in the August 14, 2018 *Federal Register*.

Local Perspectives

- An article in *El Nuevo Día* featured the Puerto Rico Bar Association's initiative to provide assistance to families to appeal FEMA denials of Individual Assistance because of issues related to property titles.

Take Action

Sign On to Protect and Expand the National Housing Trust Fund

NLIHC is re-invigorating the national Housing Trust Fund (HTF) campaign to bolster support for this first federal resource in a generation dedicated to building and preserving homes for the lowest income people. The relaunch of this campaign already has over 1,600 organizations that have signed on in support. Check to see if your organization has signed on here. If it has not, endorse the campaign today!

There are new opportunities–and significant threats–for the HTF this year and next. Housing finance reform legislation could be taken up by a lame duck Congress this fall or by the new Congress in 2019. Current legislation does not meet the $3.5 billion threshold for HTF funding established in the bi-partisan Johnson-Crapo reform bill of 2014, and advocates need to work together to ensure any housing finance reform package provides at least this level of funding. In addition, President Trump may appoint a new Federal Housing Finance Agency director who could once again suspend the statutorily required contributions by Fannie Mae and Freddie Mac to the HTF. Senator Elizabeth Warren (D-MA), on the other hand, has proposed a bold expansion of funding to the HTF in her "American Housing and Economic Mobility Act," which would allocate $44 billion each year to the HTF over ten years.

Early successes of the HTF have been detailed in NLIHC's *Getting Started: First Homes Being Built with 2016 National Housing Trust Fund Awards* report, which profiles the almost 1,500 rental homes – prioritized for seniors, people with disabilities, the homeless, and those at risk of homelessness - being created in 42 states with the first allocations of HTF dollars. The construction of homes highlighted in the Getting Started report is just the beginning. So much more must be done through additional investments in the HTF.

If you are in the Washington, DC metropolitan area on October 29, be sure to attend NLIHC's "Bold Housing Solutions: Opportunities to Expand the National Housing Trust Fund" Congressional briefing from 11:00 a.m.

to 12:00 p.m. ET. This is a free event designed to share findings from the *Getting Started* report and discuss how initial HTF investments are benefiting local communities.

Show your support for the HTF by signing onto the campaign at: https://bit.ly/2I6pffL

Register to attend the October 29 Congressional briefing at: https://bit.ly/2RGwmzP

Our Homes, Our Votes

Our Homes, Our Votes Provides Nonpartisan Voter Education Resources

With less than a month until the mid-term elections, NLIHC's *Our Homes, Our Votes* highlights resources on voter education. People vote when they feel informed and empowered to make good decisions. This includes knowing how to vote, where to vote, and what one needs to vote. It also means being informed about the candidates and ballot measures. *Our Homes, Our Votes*' resources include a recent webinar on educating voters before Election Day, a checklist for informing voters on the issues, and other useful materials for nonpartisan voter education. The League of Women Voters has resources as well, including a tool that shows all the positions up for election and the candidates running for those positions, including where they stand on key issues (like housing!), in your area by entering a ZIP code.

Opportunity Starts at Home

New Podcast Episode: Mental Health Advocates Must Be Housing Advocates

The *Opportunity Starts at Home* multisector affordable housing campaign released its seventh podcast episode on October 10 highlighting the intersections between affordable housing and mental health. The episode features Andrew Sperling, director of legislative and policy advocacy at the National Alliance on Mental Illness (NAMI). NAMI is the nation's leading voice on mental health. Mr. Sperling discusses the history of housing and mental illness, the current housing barriers facing those with mental health conditions, the necessity of stable housing for recovery, NAMI's commitment to housing affordability, and why NAMI joined the *Opportunity Starts at Home* campaign Steering Committee.

"Without access to decent, safe, affordable housing, all the aspirations we have for recovery and integration in the community just collapse," explains Mr. Sperling. "For the population I represent, no social determinant of health drives more bad health outcomes than unstable housing."

In the podcast episode, Mr. Sperling cites a recently released report by the Technical Assistance Collaborative in partnership with the Consortium for Citizens with Disabilities (CCD) Housing Task Force, "*Priced Out: The Housing Crisis for People with Disabilities*." Nearly 2 million people with serious mental illness receive Supplemental Security Income (SSI), a federal program that provides financial assistance to low income people with long-term disabilities, including mental illness. But for those who rely solely on SSI as their main source of income, finding a safe, decent, affordable home is virtually impossible without additional rental assistance. In 2016, the national average rent for a studio apartment was $752 per month and the national average rent for a one-bedroom apartment was $861 per month, but the average monthly SSI payment was only $744.

Please follow the *Opportunity Starts at Home* multisector affordable housing campaign on all social media platforms: Twitter, Instagram, Facebook, and LinkedIn.

National Housing Trust Fund

HUD Issues Notice Regarding Deadlines to Commit and Spend National Housing Trust Fund Allocations

HUD issued Notice CPD-18-12 providing guidance to states regarding their statutory and regulatory obligations to "commit" and "expend" their national Housing Trust Fund (HTF) allocations within two and five years, respectively.

The Notice issued by HUD's Office of Community Planning and Development (CPD) reminds states that the statute authorizing the HTF requires them to "commit" their allocations within 24 months. The Notice reminds states about the definition of "commit" in the regulations, and that the clock starts ticking when HUD executes a state's HTF grant agreement. The regulation requires states to "expend" their HTF allocations within five years of HUD executing a state's grant agreement. Because the commitment requirement is statutory, it cannot be waived. The expenditure requirement is regulatory, so that can be waived by HUD for good cause.

HUD requires states to enter project-specific information into HUD's electronic Integrated Disbursement and Information System (IDIS). At times, a state might not have entered all HTF commitments and expenditures into IDIS before a deadline. Consequently, HUD allows states to submit documentation of commitments executed and expenditures made before a deadline.

HUD will recapture any HTF funds not committed or expended by their respective deadlines. Recaptured funds will be reallocated to other states the following year.

Notice CPD-18-12 is at: https://bit.ly/2pK2FRL

More information about the HTF is on page 3-1 of NLIHC's *2018 Advocates' Guide.*

Research

Knowing the Facts Decreases Public Support for the Mortgage Interest Deduction

A study by Brian McCabe, "Costly, Regressive, and Ineffective: How Sensitive Is Public Support for the Mortgage Interest Deduction in the United States," published in *Housing Policy Debate* finds public support for the mortgage interest deduction (MID) declines when people learn about the MID's high cost, inequitable distribution of benefits, and ineffectiveness in expanding homeownership. Renters were more sensitive to these facts than homeowners. Democrats were most heavily influenced by the MID's inequitable benefits and ineffectiveness, whereas Republicans were most heavily influenced by the MID's cost and ineffectiveness.

The MID, a federal tax policy that allows homeowners to deduct their mortgage interest payments from their taxable income, enjoys widespread popularity. But the MID overwhelmingly benefits wealthy households (75% of the benefits go to the wealthiest 20% of households by income). The deduction is also one of the costliest expenditures in the tax code (nearly $70 billion prior to tax reform) and is ineffective in helping low or moderate income households become homeowners.

Through an online survey, McCabe asked some respondents a neutral question about their support for the MID, while he asked other respondents a similar question about their support for MID that framed the question about their support with information about one of the critiques. Respondents were also asked questions about their political affiliation and homeownership/rental status.

Overall, 82.6% of respondents supported the MID when the question was framed neutrally. But support fell for the MID to 70%, 66.7%, and 62.6% when information was given to respondents about the MID's cost, inequity, or ineffectiveness, respectively. Each respondent was given no more than one critique.

Among Democrats, support for the deduction fell nearly 20 percentage points when the question of support was framed around the issue of inequality. Among Republicans, support fell by 17 percentage points when the question was framed around cost. The largest decline in support for respondents from both parties was when the question was framed around ineffectiveness.

% Support for Mortgage Interest Deduction		
	Democrats	**Republicans**
% MID support with neutral question	81.7%	86.9%
% MID support framed with inequality	62.1%	74.5%
% MID support framed with cost	69.4%	69.7%
% MID support framed with ineffectiveness	60.0%	67.9%

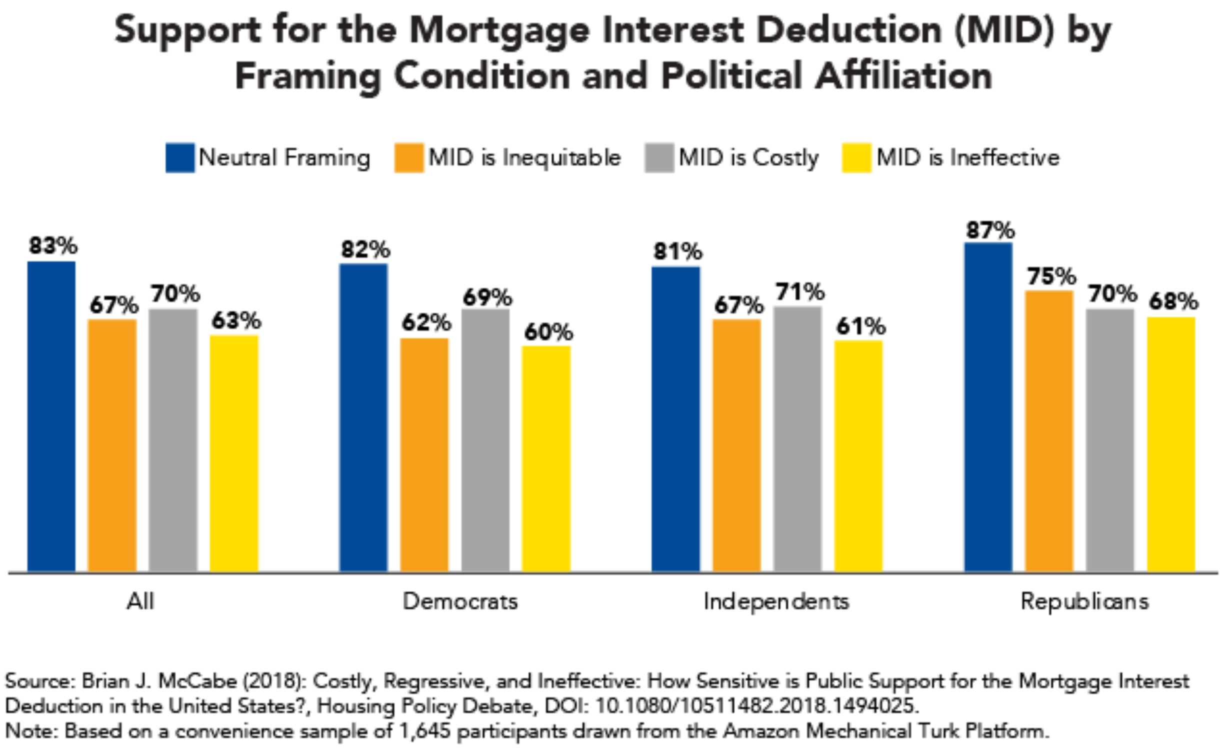
Source: Brian J. McCabe (2018): Costly, Regressive, and Ineffective: How Sensitive Is Public Support for the Mortgage Interest Deduction in the United States?, Housing Policy Debate

These results suggest that awareness about the MID's shortcomings is likely to decrease its popularity, and educating the public may bolster MID reform efforts. This study was conducted prior to the 2017 tax law (*Memo, 12/18/2017),* which will significantly reduce the costs of MID but make it more regressive, benefiting only the wealthiest homeowners.

"Costly, Regressive, and Ineffective: How Sensitive Is Public Support for the Mortgage Interest Deduction in the United States" is available at: https://bit.ly/2CEmwtU

Fact of the Week

Support for Mortgage Deduction Declines When People Understand It Is Inequitable, Costly, and Ineffective at Creating New Homeowners



Source: Brian J. McCabe (2018): "Costly, Regressive, and Ineffective: How Sensitive is Public Support for the Mortgage Interest Deduction in the United States?," *Housing Policy Debate*, DOI: 10.1080/10511482.2018.1494025.

From the Field

Oklahoma Coalition for Affordable Housing Releases Report on Economic Impact of State Housing Tax Credit

The Oklahoma Coalition for Affordable Housing, an NLIHC state partner, recently released *Oklahoma's Affordable Housing Act Tax Credit- Economic Impact 9-2018*. The report documents the results of an assessment by the Oklahoma Department of Commerce on the economic impact of the state's low income housing tax credit from 2015 to 2018. The report finds that the tax credit had positive impacts in communities throughout Oklahoma and highlights the need for more resources to address homelessness and high housing cost burdens in the state. The Oklahoma Incentive Evaluation Commission is currently reviewing the credit and will make formal recommendations on the credit to the Oklahoma state legislature on November 15.

The "Oklahoma Affordable Housing Act," (S.B. 2128), signed into law in June 2014, authorized up to $4 million per year in nonrefundable state low income housing tax credits to counties with populations of 150,000 or fewer. The credit targets tenants making 60% or less of area median incomes (AMIs) with a focus on families and seniors. The state credit has the same compliance requirements and 10-year tax credit period as the federal Low Income Housing Tax Credit.

From 2015 to 2018, the tax credit invested $15.3 million, which created 36 developments consisting of 2,007 units in 27 communities. During peak construction, 3,900 jobs were available to community members. The overall economic contribution from developers and leasing companies was over $575 million. For every dollar invested through the credit, almost $5.75 was generated in the local economy.

The state low income housing tax credit is essential for addressing the affordable housing crisis in Oklahoma. According to the 2015 Oklahoma Statewide Housing Needs Assessment, approximately 40% of renters in the state are housing cost-burdened, spending more than 30% of their incomes on their housing. The situation is even worse for the state's more than 134,000 extremely low income households, those with incomes below the poverty line or 30% of AMIs. According to NLIHC's report *The Gap: A Shortage of Affordable Homes,* 65% of Oklahoma's lowest income households spend more than half of their incomes on their housing costs. The HUD Homeless Point-in-Time count from January 2017 revealed 4,199 homeless persons in Oklahoma, with 2,385 in emergency shelters, 699 in transitional housing, and 1,115 unsheltered. Even with the state and federal tax credits, much more needs to be done to meet the affordable housing needs of the lowest income households in Oklahoma.

"The production of affordable housing, so desperately needed by families, seniors, veterans and the disabled, has had a tremendous positive impact on our state by also providing good paying jobs while stabilizing our communities," said Greg Shinn, board president of the Oklahoma Coalition for Affordable Housing.

To learn more about the report contact Andrea Frymire, secretary of the board at the Oklahoma Coalition for Affordable Housing, at: afrymire@mheginc.com

Read the full report at: https://bit.ly/2IODHcK

Resource

NYU Furman Center and Abt Associates Launch Tool for Local Communities to Assess and Address Affordable Housing Needs

The NYU Furman Center and Abt Associates recently launched LocalHousingSolutions.org, an interactive resource dedicated to helping counties, cities, and towns create and implement strategies to increase the supply of affordable housing and promote housing affordability. The site serves as a one-stop shop for local leaders to understand the housing needs of their communities and policies effective at addressing those needs.

The site allows viewers to learn the basics of affordable housing and what it takes to create a comprehensive and effective housing strategy. The site offers descriptions of a wide range of housing issues and policies. The policies are organized around a four-pronged framework – to create and preserve dedicated affordable housing, to promote affordability by reducing barriers to new supply, to help households access and afford private-market homes, and to protect against displacement and poor housing conditions.

See LocalHousingSolutions.org to learn more.

Event

National Housing Law Project to Hold Webinar on Nuisance and Crime-Free Housing Ordinances

The National Housing Law Project (NHLP) will hold a webinar, "Nuisance and Crime-Free Housing Ordinances and Policies: Protections for Survivors of Domestic and Sexual Violence" on Thursday, October 25 at 3:30 p.m. ET. Register for the webinar at: https://adobe.ly/2CCTomP

The webinar will introduce the issue of nuisance ordinances and crime-free housing policies, including how they jeopardize housing security for survivors of domestic and sexual violence. It will also discuss federal and state-level protections for survivors and other groups impacted by nuisance ordinances. NHLP's resources concerning the nuisance and crime-free issue will be shared.

NLIHC in the News

NLIHC in the News for the Week of October 7

The following are some of the news stories that NLIHC contributed to during the week of October 7.

- "Onus of young-voter turnout is on politicians, Cisneros says," *ArkansasOnline.com*, October 10 at: https://bit.ly/2OjHFzY
- "1 in 6 older black people have been homeless at some point in their life, study finds," *The Washington Post*, October 9 at: https://wapo.st/2RJp5zj
- "Florida lawmakers must stop directing affordable housing funds elsewhere, influencers say," *Miami Herald*, October 8 at: https://hrld.us/2QEhd0M
- "Almost 90% of new metro Phoenix apartments are luxury, requiring hefty rents," *The Arizona Republic*, October 7 at: https://bit.ly/2Ef3Oed

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NLIHC News

Where to Find Us – October 15

NLIHC President and CEO Diane Yentel and other NLIHC staff will be speaking at the following events in the coming months:

- NCSHA's 2018 Annual Conference & Showplace, Austin, TX, on October 16
- Neighborhood Partnerships Conference, Salem, OR, on October 22
- Utah's 14th Annual Homelessness Summit, Salt Lake City, UT, on October 25
- Utah Housing Matters Conference, Ogden, UT, on November 7
- Facing Race: A National Conference, Detroit, MI, November 8-9
- Maine Affordable Housing Coalition Conference, Portland, ME, on November 14
- NHC Solutions for Affordable Housing Convening, Washington, DC, on November 27

NLIHC Staff

Sonya Acosta, Policy Analyst, x231
Andrew Aurand, Vice President for Research, x245
Anissa Balderas, Field Intern, x252
Victoria Bourret, Housing Advocacy Organizer, x244
Josephine Clarke, Executive Assistant, x226
Dan Emmanuel, Senior Research Analyst, x316
Ellen Errico, Creative Services Manager, x246
Justin Godard, Housing Advocacy Organizer, x233
Ed Gramlich, Senior Advisor, x314
Paul Kealey, Chief Operating Officer, x232
Mike Koprowski, Director, Multisector Housing Campaign, x317
Joseph Lindstrom, Manager, Field Organizing, x222
Lisa Marlow, Communications Specialist, x239
Sarah Mickelson, Senior Director of Public Policy, x228
Khara Norris, Director of Administration, x242
Dina Pinsky, Research Intern, x249
Catherine Reeves, Development Coordinator, x234
Lauren Ricci, Policy Intern, x241
Debra Susie, Disaster Housing Recovery Coordinator, x227
Elayne Weiss, Senior Policy Analyst, x243
Chantelle Wilkinson, Housing Campaign Coordinator, x230
Renee Willis, Vice President for Field and Communications, x247
Gloria Yang, Communications & Graphic Design Intern, x250
Diane Yentel, President and CEO, x225