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THE NATIONAL HOUSING TRUST FUND A SUMMARY OF 2019 STATE PROJECTS

Ed Gramlich, Senior Advisor
National Low Income Housing Coalition



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Front Cover Image:

My Angel, PSH chronically homeless veterans, Adaptive reuse of former appliance store, LAFHBuilds, Los Angeles, CA

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INTRODUCTION

This report describes how states awarded their 2019 national Housing Trust Fund (HTF) allocations to projects requesting HTF funds. For 2019, \$248 million in HTF was available nationally. 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 working relationships with SDE staff.

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](#).

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 2019 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, and [The National Housing Trust Fund: An Overview of 2018 State Projects](#) in October 2022, addressing how states proposed awarding their 2017 and 2018 HTF allocations, respectively. In addition to this report, which examines 2019 HTF allocations, another report reflecting 2020 HTF allocations will be published soon.

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 the 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 Cove at Newhaven, General occupancy, Vantage Management, Gunterville, AL

In 2019, 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 37 affordable and available apartments.

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 that occurred 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 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 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 2019 – \$248 million – 27 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 declined to \$382 million in 2023 and \$214 million in 2024.

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 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.

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

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.



Old Mat Road, Homeless and disabled, Valley Residential Services, Wasilla, AK

In this 2019 HTF report, NLIHC for the first time provides a qualitative assessment of the extent to which a state's HTF Allocation Plan is informative to a non-developer, general public reader. NLIHC has 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 provided eight states with an "A" grade and 12 states with a "B" grade. Unfortunately, 20 states and subrecipients have been assigned a "C," while eight states and subrecipient(s) received a "D" and three received an "F." Appendix B provides detailed explanations regarding the letter grades. In general, most HTF Allocation Plans are 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 Annual Action Plans.

Also new in this 2019 report, NLIHC provides a qualitative assessment of each state's website. In order for residents to be effective advocates for how their state uses the HTF, they 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, including the extent and clarity of each state's HTF description.

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 must 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 – is often difficult, requiring a reader to navigate extensively through a website and make guesses 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 finds that the information provided by SDEs is written for developers, not the general public or advocates seeking to influence the type of development or the population type to be housed with HTF assistance.



Uniktali Apartments, Two- and three-bedroom units, general occupancy, Swell LLC, Unalaska, AK

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 must 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.

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

Although 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 from other programs to affordable housing projects. 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 (69% of them occurring as infrequently as only once a year). States choose primarily to synchronize the HTF award process with LIHTC cycles, but they also occasionally synchronize the process with specific HOME and/or state HTF cycles, as well as special award cycles targeted to special needs projects.



Stepping Stone Phase III, PSH chronically homeless, Native American Connections, Phoenix, AZ

A review of each state’s 2019 HTF Allocation Plan and/or application materials* shows that all but 16 states have annual application cycles. Some of these states indicate that if there is an insufficient number of applications or applications that meet a state’s threshold requirements, subsequent opportunities to apply will be provided. Four states have semi-annual cycles, and one has a quarterly cycle, while nine states accept applications on a rolling basis. Twenty-four states enmeshed the HTF application process with their existing LIHTC cycle

*Some states’ 2019 HTF Allocation Plans or application materials offer very limited information.

in some fashion. Of these 24 states, 12 states' processes included the HOME program and/or state programs as well as the LIHTC program. In the cases of 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 the 24 states, seven had multiple options – including a LIHTC option – from which an HTF applicant could choose, while seven states tied HTF applications to the LIHTC program only.

Twenty-two states had an HTF-specific application, although five 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, six 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. One state's HTF application was tied specifically to their HOME program only. Likewise, as mentioned in the previous paragraph, seven states had multiple options – including a LIHTC option – from which an HTF applicant could choose, two of which were set-asides for Permanent Supportive Housing or for the purpose of serving people experiencing homelessness.



Veterans Village, Homeless veterans, Beck PRIDE Center for America's Wounded Veterans, Jonesboro, AR

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 – the other 50% of its HTF allocation to Hawai'i, Kaua'i, or Maui counties on a rotating basis that changes annually.



My Angel, PSH chronically homeless veterans, Adaptive reuse of former appliance store, LAFHBuilds, Los Angeles, CA

OVERVIEW OF FINDINGS

HOUSING TRUST FUND AWARDS BY STATE IN 2019

From the \$248 million 2019 HTF allocation, 50 states and the District of Columbia awarded HTF assistance to 174 projects that included 1,401 HTF-assisted units. NLIHC arrived at this unit count for 2019 by prorating the total number of units (1,759) in projects using HTF funds from previous and/or subsequent HTF allocation years.

STATE	PROJECTS	2019 UNITS	ALL YEARS UNITS
Alabama	3	14	14
Alaska	3	6	10
Arizona	3	10	27
Arkansas	2	19	19
California	4	87	113
Colorado	4	16	18
Connecticut	2	18	37
Delaware	3	12	23
District of Columbia	1	16	26
Florida	7	22	34
Georgia	2	23	27
Hawaii	3	12	21
Idaho	5	8	8
Illinois	4	36	60
Indiana	3	31	48
Iowa	1	31	31
Kansas	5	16	16
Kentucky	2	9	23
Louisiana	4	15	33
Maine	3	19	19
Maryland	2	18	18
Massachusetts	6	73	73
Michigan	3	41	85
Minnesota	2	23	24
Mississippi	2	40	40
Missouri	4	19	28

STATE	PROJECTS	2019 UNITS	ALL YEARS UNITS
Montana	2	22	28
Nebraska	3	15	27
Nevada	1	27	36
New Hampshire	2	13	19
New Jersey	6	16	16
New Mexico	4	23	23
New York	3	108	108
North Carolina	4	20	34
North Dakota	1	19	19
Ohio	4	47	54
Oklahoma	2	27	27
Oregon	4	15	15
Pennsylvania	7	32	32
Rhode Island	3	14	21
South Carolina	3	8	27
South Dakota	4	21	21
Tennessee	4	20	31
Texas	3	79	79
Utah	7	41	45
Vermont	5	11	22
Virginia	5	30	30
Washington	2	17	24
West Virginia	4	29	29
Wisconsin	5	72	76
Wyoming	2	41	41

TOTAL: 174 projects with 1,401 units assisted with 2019 HTF funds, total of 1,759 units assisted with HTF funds from other allocation years

For projects with HTF from multiple years, NLIHC has prorated the number of 2019 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](#).

PROJECTS TARGETED TO SPECIAL NEEDS POPULATIONS

As in previous years, states in 2019 utilized most of their HTF resources to target projects that will serve people experiencing homelessness, people with disabilities, elderly people, veterans, or other special needs populations. For example, states report the following information:

- **Homelessness.** Forty-two projects in 27 states planned to serve homeless households in 381 units assisted with 2019 HTF funds. Nineteen of those projects also received HTF funds from previous and/or subsequent HTF allocation years; adding units assisted with those years' funds, the 42 projects had a total of 467 HTF-assisted units. States awarded \$62,698,055 in 2019 HTF funds (25% of all 2019 HTF awards) to the 42 projects. Including previous and/or subsequent HTF allocation years' funds, states awarded a total of \$86,385,212 to the 42 projects planned to serve people experiencing homelessness. ([More details are available on page 20.](#))
- **Seniors.** Thirty-seven projects in 26 states planned to serve seniors in 380 units assisted with 2019 HTF funds. Ten of those projects also received HTF funds from previous and/or subsequent HTF allocation years; adding units assisted with those years' funds, the 37 projects had a total of 442 HTF-assisted units. States awarded \$58,605,505 in 2019 HTF funds (22% of all 2019 HTF awards) to the 37 projects. Including previous and/or subsequent HTF allocation years' funds, states awarded a total of \$68,882,086 to the 37 projects planned to serve seniors. ([More details are available on page 21.](#))
- **Disabilities.** Twenty-six projects in 19 states were planned to serve people with disabilities in 219 units assisted with 2019 HTF funds. Eight of those projects also received HTF funds from previous and/or subsequent HTF allocation years; adding units assisted with those years' funds, the 26 projects had a total of 296 HTF-assisted units. States awarded \$38,312,585 in 2019 HTF funds (16% of all 2019 awards) to the 26 projects. Including previous and/or subsequent HTF allocation years' funds, states awarded a total of \$70,189,219 to the 26 projects planned to serve people a disability. ([More details are available on page 21.](#))
- **Mixed Special Needs.** Seven states reported eight projects that planned to use their 2019 HTF allocation in 54 units to serve an unspecified mix of populations that might include people experiencing homelessness, people with a disability, seniors, or people with other special needs. Three of those projects also received HTF funds from previous and/or subsequent HTF allocation years; adding units assisted with those years' funds, the eight projects had a total of 82 HTF-assisted units. States awarded \$8,069,984 in 2019 HTF funds (3% of all 2019 awards) to the eight projects. Including previous and/or subsequent HTF allocation years' funds, states awarded a total of \$14,817,186 to the eight projects planned to serve a mix of special needs people. ([More details are available on page 21.](#))
- **Other Special Needs.** Ten states reported 11 projects that planned to use their 2019 HTF allocation in 135 units to serve a variety of other special needs populations, specifically: veterans, youth aging out of foster care, survivors of domestic violence, HIV-affected families, and sober living. Four of those projects also received HTF funds from previous

and/or subsequent HTF allocation years; adding units assisted with those years' funds, the 11 projects had a total of 144 HTF-assisted units. States awarded \$18,639,176 in 2019 HTF funds (6% of all 2019 awards) to the 11 projects. Including previous and/or subsequent HTF allocation years' funds, states awarded a total of \$23,718,996 to the 10 projects planned to serve other special needs populations. ([More details are available on page 22.](#))

- **General Occupancy/Family.** Thirty-two states reported 73 projects that did not target 2019 HTF units to a special needs population; instead, their HTF units were characterized as "general occupancy" or "family." Nevertheless, 86% of the projects in the "family" category will serve a very important need because they will include some units with three or more bedrooms, a unit size needed by larger families. (More details are available on page X.) The 73 projects planned to assist 522 general occupancy units with their 2019 HTF allocation. Seventeen of those projects also received HTF funds from previous and/or subsequent HTF allocation years; adding units assisted with those years' funds, the 17 projects had a total of 611 HTF-assisted units. States awarded \$69,817,384 in 2019 HTF funds (28% of all 2019 awards) to the 73 projects. Including previous and/or subsequent HTF allocation years' funds, states awarded a total of \$87,769,544 to the 72 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 20.](#))

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.

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

Mississippi requires HTF-assisted projects to set aside at least 20% of the total units for ELI households.



Stonegate Village Phase I, PSH chronically homeless, Self-Help Enterprises, Paterson, CA

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 at 30% of 30% AMI or five units at 30% of 30% AMI, whichever is greater. Ohio can also award competitive points (see below).

In **Florida**, all but one 2019 HTF project was awarded HTF from RFA 2019-116, the RFA most frequently used by HTF applicants since 2017. That RFA requires projects to set aside 10% of the total units for ELI households; Florida calls these units "ELI Set-Aside units." If an RFA 2019-116 project seeks and is awarded HTF, it can request a forgivable HTF loan to subsidize additional deeply targeted units for people with special needs who have income at or less than 22% AMI. For 2019, such projects must set aside four HTF units at projects in large counties or three HTF units at projects at medium-sized counties. These 22% AMI HTF units are in addition to the 10% required ELI Set-Aside units and must be set aside as "Link Units for Persons with Special Needs." Florida's "Link Strategy" requires applicants to work with at least one "Special Needs Household Referral Agency" working in their county that will refer people experiencing homelessness, people at risk of homelessness, or other special needs household to occupy HTF-assisted units.

Seven states can award competitive points to projects that will provide ELI-targeted units:

Connecticut can provide three points (out of 132) if 5%-10% of a project's units are targeted to ELI households, five points if 10%-15% are ELI, and eight points if 15%-20% are ELI. The state subtracts five points for projects that propose 30% or more ELI-targeted units.

Nevada can award two points (out of 62) if 25% of a project's units are targeted to ELI households, four points if 30% are ELI, and six points if 35% are ELI.

New Hampshire can provide five points (out of 150) if 10% or more of a project's units are targeted to ELI households.

North Dakota can award 20 points (out of 155) if 20% of a project's units are targeted to ELI households, 30 points if 25% are ELI, 40 points if 30% are ELI, and 50 points if 35% are ELI.

Ohio has a threshold requirement of 10% of a project's units to be rent restricted and affordable at 30% AMI or five units at 30% AMI, whichever is greater. Ohio can also provide 30 points (out of 100) if an additional 10% of a project's units are targeted to households with income equal to or less than 15% AMI. Alternatively, 10 points can be awarded if an additional 5% of a project's units are targeted to ELI households, and 20 points if 30% are ELI.

Utah can award 10 points (the total available number is not clear) 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 4% LIHTC projects, Utah can award five additional points for each unit targeted to households at 30% AMI, 10 points for units at 25% AMI, 15 points for units at 20% AMI, and 20 points for units at 15% AMI.

Wyoming can award up to 36 points (out of 471) based on the percentage of units rent restricted to 30% AMI.



New Horizons Village Part 1, PSH physically disabled, New Horizons Village, Inc., Farmington, CT

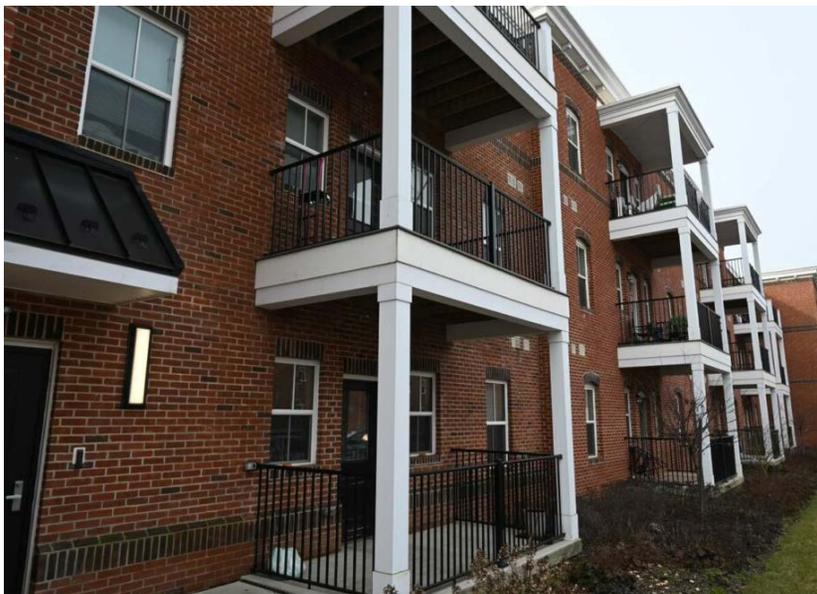


Viña Apartments, General occupancy, Urban Land Conservancy, Denver, CO



POLICIES LIMITING ACCESS TO NONPROFITS

Six states have policies that will only award HTF funds to applications from nonprofit organizations: Delaware, the Honolulu subrecipient of Hawai'i, Maine, Massachusetts, Tennessee, and Washington. (Tennessee and Washington include public housing agencies, and Washington also includes Tribally Designated Housing Entities.) These states allow nonprofits to partner with for-profit developers. Indiana has two HTF application tracks, only nonprofits can apply through the track for applications that will not rely on LIHTC financing. New Mexico can award five points (out of 115) for applications submitted by nonprofits or Tribally Designated Housing Entities. New Jersey can award points (in an unspecified number) for applications submitted by nonprofits.



The Flats, Phase IV, General occupancy, HDC MidAtlantic and Todmorden Foundation, Wilmington, DE

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.

It is known, however, that the Low-Income Housing Tax Credit (LIHTC) was a key financing component of 135 HTF-assisted projects in 45 states, while 33 other projects in 20 states did not use LIHTC. The HOME program contributed gap financing in 62 projects in 33 states, while the Federal Home Loan Banks' Affordable Housing Program (AHP) provided gap financing for 32 projects in 24 states. Resources from state or local housing trust funds were used in 45 projects in 22 states, while other state or local programs were used in 90 projects in 35 states. ([This topic is discussed further in "Other Resources in Housing Trust Fund-Assisted Projects" on page 31.](#))

TYPES OF PROJECTS

SMALL-SCALE PROJECTS

Five states have policies oriented to small-scale projects. Illinois limits HTF awards to permanent supportive housing projects with 25 or fewer units, which the SDE indicates are not conducive to LIHTC funding. Nebraska sets aside about 25% of its HTF allocation (\$700,000 in 2019) for smaller scale projects that will not have LIHTC financing (the maximum number of units is not indicated). 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. South Carolina devotes 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.

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 24 to 36 units. Since HTF's inception, Idaho seems to have maintained a practice that in 2019 resulted in three of its five projects constructing small properties to assist only one household. South Dakota can award 10 points (out of 965) to properties with 16 units or less.

NEW CONSTRUCTION, ADAPTIVE REUSE, PRESERVATION, REHAB CREATING NEW UNITS

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...”



Innovare Apartments, PSH homeless, Volunteers of America-Florida, St. Petersburg, FL

NEW CONSTRUCTION

Forty-two states allocated some or all their 2019 HTF funds, amounting to \$165,973,215 (\$231,162,449 counting total HTF funds from previous and/or subsequent years' allocations) for 110 new construction projects estimated to have 980 units assisted with 2019 HTF funds (or a total of 1,185 HTF-assisted units if not prorated to reflect HTF from other years' allocations) among 6,593 total units. Alabama, Arkansas, California, the District of Columbia, Florida, New York, South Carolina, and Washington had policies for 2019 that only accepted applications for new construction projects. Minnesota policy prioritized new construction and New Mexico provided one competitive point for each ELI unit for every three market-rate units (up to 10 points out of 115) for new construction projects in 2019.



Hā'upu View, General occupancy, Ahe Group, Lihue, County of Kaua'i, HI

ADAPTIVE REUSE

Eleven states reported allocating \$9,921,476 in 2019 HTF funds (\$18,094,866 using HTF funds from previous and/or subsequent HTF allocation years) for "adaptive reuse" of 14 non-housing structures to create 561 new housing units (84 assisted with 2019 HTF funds, and 124 units assisted with HTF funds from other years).

HTF policy in two states in 2019 offered competitive points for adaptive reuse: North Dakota offered five points (out of 155), while New Mexico's adoptive reuse policy focused on converting hotels into affordable housing units, offering up to 10 points (out of 115) depending on the ratio of affordable units to market-rate units post conversion. [More details are available on page 27.](#)

PRESERVATION

Twenty-six states allocated \$43,503,352 in 2019 HTF (\$58,307,668 in total, counting HTF funds from other years' allocations) to preserve a total of 3,978 affordable units (353 assisted with 2019 HTF funds, 441 HTF-assisted units if not prorated to reflect HTF from other years' allocations) in 42 existing affordable housing projects.

Five states had 2019 policies that gave competitive points or unspecified preference to HTF applications that would preserve affordable housing: Louisiana gave five points (out of 100), Oklahoma gave five points (out of 52), South Dakota gave 10 points (out of a potential 965), Wisconsin gave five points (out of a potential 89), and Tennessee gave preference.

The District of Columbia and Indiana had policies that did not allow HTF to be used for preservation activities in 2019. [More details are available on page 24.](#)

REHABILITATION CREATING NEW HOUSING

As reported to NLIHC, four states awarded \$3,689,430 in HTF to five projects that were indicated as falling under the categories of “rehabilitation” or “acquisition and rehabilitation,” which upon further research were determined not to be preservation or adaptive reuse projects. The further research indicated that these projects were not merely acquisition and rehabilitation projects but in fact were projects that would create 60 new affordable housing units (18 HTF-assisted). [More details are available on page 29.](#)

REHABILITATION ONLY

As best as NLIHC could determine, only one project was a simple “acquisition and rehabilitation” project. This project was anticipated to use \$897,217 in HTF funds for 9 units, all HTF-assisted – meaning that they must be affordable to extremely low-income households.



Windy Court II, General occupancy, Repurposed shipping containers, LEAP Housing, Boise, ID



Hope Plaza II, General occupancy, Advocates Against Family Violence, Caldwell, ID

TARGETED POPULATIONS

STATE POLICIES AND PRACTICES FOR TARGETING SPECIAL NEEDS POPULATIONS

Relying on information provided by states in their 2019 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. Even though a state might have a policy or set-aside, that does not necessarily lead to a policy or set-aside being fulfilled. States must commit HTF allocations within two years, and a project meeting a targeting goal, for example, might be far enough along the development process for it 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 states have specific provisions pertaining to projects targeting HTF funds to people experiencing homelessness. Eleven states' provisions are specific to people with disabilities. Twenty-seven 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. Thirteen states have provisions regarding permanent supportive housing (PSH).



Main Street Lofts, PSH developmental, intellectual, mental health disabilities, Association for Individual Development, West Chicago, IL

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 2019. 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 allocation. Following the 2019 prorated count, a total count of HTF-assisted units for a project is indicated in parentheses.



Homan Square, PSH people with physical accessibility needs, IFF and Foundation for Homan Square, Photo: Kai Brown Photography LLC, Chicago, IL

PEOPLE EXPERIENCING HOMELESSNESS

Twenty-seven states and 42 projects with 381 units were assisted with 2019 HTF funds (467 total units were assisted with all years’ HTF funds). These include:

- No distinction indicated: 16 states, 22 projects, 145 units assisted with 2019 HTF funds (338 total units with all years’ HTF funds).
- Chronically homeless: 6 states, 8 projects, 45 units assisted with 2019 HTF funds (76 total units with all years’ HTF funds).
- Homeless seniors: 4 states, 4 projects, 63 units assisted with 2019 HTF funds.
- Homeless families with children: 2 states, 2 projects, 3 units assisted with 2019 HTF funds (6 total units with all years’ HTF funds).
- Homeless domestic violence survivors: 2 states, 2 projects, 37 units assisted with 2019 HTF funds.
- Homeless with a mental disability: 2 states, 2 projects, 7 units assisted with 2019 HTF funds (14 total units with all years’ HTF funds).
- Homeless and disabled (no distinction): 1 state, 1 project, 7 units assisted with 2019 HTF funds (10 total units with all years’ HTF funds).
- Homeless people living with AIDS: 1 state, 1 project, 34 units assisted with 2019 HTF funds.
- Homeless veterans: 1 state, 1 project, 24 units assisted with 2019 HTF funds.
- Homeless youth exiting foster care: 1 state, 1 project, 20 units assisted with 2019 HTF funds.

PEOPLE WITH DISABILITIES

Nineteen states and 26 projects with 219 units were assisted with 2019 HTF funds (296 total units were assisted with all years' HTF funds). These include:

- No distinction indicated: 4 states, 5 projects, 53 units assisted with 2019 HTF funds (90 total units with all years' HTF funds).
- Developmental disability: 5 states, 5 projects, 428 units assisted with 2019 HTF funds (33 total units with all years' HTF funds).
- Youth with developmental disability: 1 state, 1 project 8 units assisted with 2019 HTF funds.
- Physical disability: 3 states, 3 projects, 40 units assisted with 2019 HTF funds (53 total units with all years' HTF funds).
- Mental disability: 5 states, 5 projects, 44 units assisted with 2019 HTF funds (56 total units with all years' HTF funds).
- Mental disability and homeless: 2 states, 2 projects, 7 units assisted with 2019 HTF funds (14 total units with all years' HTF funds).
- Disabled veterans: 1 state, 2 projects, 8 units assisted with 2019 HTF funds.
- High-functioning adults on the autism spectrum: 1 state, 1 project, 6 units assisted with 2019 HTF funds.
- Disabled seniors: 2 states, 3 projects, 26 units assisted with 2019 HTF funds (27 total units with all years' HTF funds).

MIXED SPECIAL NEEDS POPULATIONS

Seven states indicated that eight projects were planned that would have 54 units assisted with 2019 HTF funds (82 total units were assisted with all years' HTF funds) targeted to a mix of special needs populations without being limited to one type of special needs population, such as homeless, disabled, or elderly populations.

SENIORS

Twenty-six states and 37 projects with 380 units were assisted with 2019 HTF funds (442 total units were assisted with all years' HTF funds). These include:

- No distinction indicated: 21 states, 25 projects, 194 units assisted with 2019 HTF funds (255 total units with all years' HTF funds).
- Seniors experiencing homelessness: 4 states, 4 projects, 63 units assisted with 2019 HTF funds.
- Seniors with mental illness: 1 state, 2 projects, 6 units assisted with 2019 HTF funds (7 total units with all years' HTF funds).
- Seniors with physical disability: 1 state, 1 project, 20 units assisted with 2019 HTF funds.
- Seniors with a disability (no distinction): 1 state, 1 project, 3 units assisted with 2019 HTF funds.

PERMANENT SUPPORTIVE HOUSING

Although NLIHC is not confident that all SDEs indicated whether a project entailed permanent supportive housing (PSH), 26 states did indicate PSH with 50 projects containing 583 PSH units assisted with 2019 HTF funds (739 total units were assisted with all years' HTF funds).

OTHER TARGETING

Veterans: Two states and 3 projects with 32 units were assisted with 2019 HTF funds. These include:

- Disabled: 1 state, 2 projects, 8 units assisted with 2019 HTF funds.
- Homeless: 1 state, 1 project, 24 units assisted with 2019 HTF funds.

Youth Aging Out of Foster Care: 3 states, 3 projects with 28 units were assisted with 2019 HTF funds (33 total units with all years' HTF funds).

Domestic Violence Survivors: 2 states, 2 projects with 37 units were assisted with 2019 HTF funds.

HIV-Affected Families: 2 states, 2 projects with 37 units were assisted with 2019 HTF funds (47 total units with all years' HTF funds).

Sober Living: 1 state, 1 project with 1 unit was assisted with 2019 HTF funds (10 total units with all years' HTF funds).



Hope Avenue Homes, PSH homeless, South Bend Heritage Foundation, South Bend, IN

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. New Mexico provides 10 points (out of 115) for projects on tribal lands and five points if the developer is a Tribally Designated Housing Entity. However, neither South Dakota nor North Dakota reported using 2019 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. However, two projects in Arizona were developed and are operated by Native American Connections. While open to anyone, the projects provide behavioral health, affordable housing, and community development services that are culturally appropriate to Native Americans. In addition, a project in Minnesota was developed in partnership with the Red Lake Housing Authority of the Red Lake Band, Ojibwe Nation.

LARGE FAMILY UNITS

It is especially difficult to find affordable homes for larger families that need more than two bedrooms. Five states' HTF Allocation Plans or RFPs/NOFAs provided competitive points regarding applications proposing units with more than two bedrooms. Alaska claims larger family units are a priority but will only award two points (out of 231) based on the percentage of units with three or more bedrooms. 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). Nevada can award up to 10 points (out of 62) if 20% or more units in a project have three or more bedrooms. New Hampshire can award 10 points (out of 125) to a project with 25% or more units having two or more bedrooms. North Dakota can award 10 points (out of 155) to projects if 20% or more of the HTF-assisted units have three or more bedrooms. Florida, on the other hand does not use HTF to fund units greater than two bedrooms.

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. Sixty-five projects in 35 states are projects with three- or more-bedroom units. Of these projects, NLIHC has learned that 40 have 813 three-bedroom units (it is not possible to know how many are HTF-assisted, except in three instances). One project has 60

three-bedroom units plus 16 four-bedroom units. In the cases of 13 projects, we know only that they include a mix of one-, two-, and three-bedroom units. Seven projects have a mix of three- and four-bedroom units, and another nine projects have 43 four-bedroom units. One project has a mix of four- and five-bedroom units in single-family homes. One project has two five-bedroom units, and one has two six-bedroom units.



Shelter House Housing First 2.0, PSH homeless, Shelter House Community and Transition Services, Iowa City, IA

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 THE TYPES OF PROJECTS

PRESERVATION

As reported to NLIHC, 26 states chose to award \$43,503,352 in 2019 HTF funds (\$58,307,668 in total, counting HTF funds from other years’ allocations) for various forms of “preservation” at 42 existing affordable housing projects, intended to preserve a total of 3,978 affordable units (353 assisted with 2019 HTF funds, and 441 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 in order to keep existing affordable units affordable and available to extremely low-income households, rather than allow those units to be lost, thereby adding to the shortage of such units.



Brentwood Villas, Seniors, Community Housing of Wyandotte County, Olathe, KS



Miller-Roy Building, General occupancy, Adaptive reuse of historic building, EM Miller-Roy, Developer, LLC, United Way of Northeast Louisiana, Monroe, LA

PRESERVING HUD- AND USDA-ASSISTED HOUSING

Of the 26 states using 2019 HTF to preserve the 42 existing affordable housing projects referenced in the previous paragraph, 18 states used HTF funds to preserve projects that previously received federal taxpayer investments through five federal programs: HUD's Section 8 Project-Based Rental Assistance, the USDA's Rural Development (RD) Section 515 rental assistance program, HUD's Section 202 Supportive Housing for the Elderly, and HUD's Section 18 Demolition/Disposition of public housing and Section 22 Voluntary Conversion of public housing to Project-Based Vouchers. Those 18 states used \$22,465,570 of their 2019 HTF allocations (\$31,465,570 in total, counting HTF funds from other years' allocations) to preserve a total of 2,042 units (184 units assisted with 2019 HTF funds, and 249 total HTF-assisted units if not prorated to reflect HTF from other years' allocations) at 25 projects.



Capstone at Scotlandville, Mixed special needs, The Banyan Foundation, Baton Rouge, LA

- Section 8 Project-Based Rental Assistance: Seven states used \$7,397,989 of their 2019 HTF allocations (\$13,292,605 in total, counting HTF funds from previous and/or subsequent years' allocations) to preserve a total of 1,401 units at nine projects with 69 units assisted with 2019 HTF funds (116 total units if not prorated to reflect HTF from other HTF year's allocations).
- Rural Development Section 515: Five states used \$4,560,400 of their 2019 HTF allocations (\$5,435,750 in total, counting HTF funds from previous and/or subsequent years' HTF allocations) to preserve a total of 509 units in 10 projects with 47 units assisted with 2019 HTF funds (51 total units if not prorated to reflect HTF from other years' HTF allocations).
- Section 202 Supportive Housing for the Elderly: Three states used \$5,554,398 of their 2019 HTF allocations (\$7,828,002 in total counting HTF funds from previous and/or subsequent years' HTF allocations) to preserve a total of 427 units at three projects with 42 units assisted with 2019 HTF funds (56 total units if not prorated to reflect HTF from other years' HTF allocations).
- Section 18 Demolition/Disposition and Section 22 Voluntary Conversion: Three states used HUD Section 18 Demolition/Disposition procedures to demolish existing public housing and construct replacement units subsidized with Project-Based Vouchers, while another state used HUD's Section 22 Voluntary Conversion procedure to convert existing public housing to Project-Based Vouchers. These four states use \$4,952,783 of their 2019 HTF allocations to preserve a total of 214 units at four projects with 26 units assisted with 2019 HTF funds. Three of the projects not only preserved existing units but also led to the creation of 189 new units.

PRESERVING OTHER AFFORDABLE HOUSING UNITS

Another eight projects in seven states were also intended to preserve existing affordable housing that had not been subsidized with federal rental assistance. The eight projects would make available a total of 581 units (81 units assisted with 2019 HTF allocations, and 97 total HTF-assisted units if not prorated to reflect HTF from other years' allocations).



34 Ohio Street, PSH homeless, Community Housing of Maine, Bangor, ME

RENTAL ASSISTANCE DEMONSTRATION

Seven states used some of their 2019 HTF allocations at eight 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 those former public housing units to be preserved as affordable and available to extremely low-income households. A total of 846 units, 84 assisted with 2019 HTF allocations (91 total HTF-assisted units if not prorated to reflect HTF from previous and/or subsequent years' allocations) would be preserved by using \$12,444,018 in 2019 HTF allocations (\$13,999,610 in total, counting HTF funds from other years' allocations).

POPULATION CHARACTERISTICS OF PRESERVED PROPERTIES

Of the federally assisted units (e.g. those units assisted through Section 8, RD 515, Section 18, or Section 22) that were preserved, 258 units (23 HTF-assisted) were for seniors (at three Section 515 projects and one PBRA project). The Section 202 projects referenced above are by definition targeted to seniors. None of the others were targeted to any special needs population. States indicated that eight projects would be located in rural areas.

Of the units that were preserved but not federally assisted, 293 units (30 HTF-assisted) were targeted for people experiencing homelessness. One project with 80 units (15 HTF-assisted) was targeted to seniors.

Of the RAD projects, only one project with 60 units (8 HTF-assisted) was intended to house a special needs population (youth aging out of foster care).

ADAPTIVE REUSE

Eleven states reported to NLIHC that 14 projects would fall under the categories of “rehabilitation” or “acquisition and rehabilitation”; however, these projects are in fact “adaptive reuse” projects – that is, projects creating 561 new units (84 assisted with 2019 HTF funds, and 124 units assisted with HTF funds from previous and/or subsequent years’ allocations) using \$9,921,476 in 2019 HTF funds, and \$18,094,866 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:

- A for-profit developer has converted a vacant, four-story building at a small college that contained classrooms and a dormitory into 74 affordable housing units. Half the units are a mix of two-, three-, and four-bedroom units. The building (constructed in 1929) and the adjacent administration building (constructed in 1890) are on the National Register of Historic Places. A fourth-floor chapel in the building was converted into a three-bedroom unit, while a gym was converted into two multi-level units. The building also housed a chemistry lab, whose wood and glass cabinets are integrated into several of the new units. The building was part of a 70-acre campus (with 15 historic buildings) that was purchased in its entirety by a for-profit entity that plans to build a community that includes market-rate housing, a grocery store, and other retail buildings.

- A nonprofit organization planned to convert a commercial office into 13 affordable housing units and offices for another nonprofit. The units will provide permanent supportive housing for families with members who are HIV-affected. Nonprofit staff will also provide health and employment services to others in the community.
- In a rural southern town, a three-story building was constructed in 1929 by a Black dentist and a Black physician who had offices on the first floor. Over the years, the first and second floors contained a variety of commercial ventures, such as a pharmacy, beauty shop, barber shop, insurance office, African-American newspaper, restaurants, and a pool hall. The third floor was home to the Savoy Ballroom, which saw performances by famous musicians including Louis Armstrong, Duke Ellington, Ella Fitzgerald, Lina Horn, and Fats Domino. The building was the hub of Black businesses in the area.



Maple on Franklin, Seniors, NeighborWorks Housing Solutions, Hollbrook, MA

Over the decades, the building fell into disuse and disrepair and ultimately became vacant before being condemned by the city and slated for demolition in 2010. However, in 2011, the building was added to the National Register of Historic Places. A for-profit developer purchased the building and converted it into 18 affordable units while also constructing an additional 48 units adjacent to the historic structure. Four units are reserved for people experiencing homelessness and 24 units have Project-Based Vouchers. The first floor of the historic building has a resource center that houses several nonprofits serving the community.

- A nonprofit converted a long-vacant 1960s Holiday Inn into 76 units of housing to be occupied primarily by seniors. The project also entails converting part of the hotel property into a healthcare facility. The hotel had three two-story buildings and two three-story buildings surrounding an open courtyard. A healthcare clinic on the first floor will serve the residents as well as the surrounding community.
- A nonprofit converted a 94-year-old structure, originally built to be a dormitory for student nurses but last used as county government offices, creating 32 studio apartments targeted to people with mental health and substance abuse disorders, many of whom were previously homeless. Housing and common spaces are included on the third and fourth floors, while the second floor has workspaces for 60 staff of the nonprofit serving the residents and the broader community. The first floor has an outpatient clinic, teaching kitchen, and space for community education.

- A nonprofit planned to preserve an historic 1893 school building by converting it into a mixed-use project, creating 11 permanent supportive housing units on the fourth floor for people experiencing homelessness. The remaining floors are scheduled to include a 48-bed family shelter on the third floor, a 14-bed shelter for single women on the second floor, and an 18-bed shelter for single men on the first floor. There are to be spaces for onsite healthcare, childcare, and other services to help people achieve stable housing.
- A nonprofit planned to redevelop a six-story former casket factory on the National Register of Historic Places – built in three stages in 1880, 1919, and 1925 – into 71 housing units (59 affordable).



Island Parkside Phase 1, (Armand Michael Hyatt Apartments), General occupancy, Lawrence Community Works, Photo courtesy of Delphi Construction, Lawrence, MA

- A for-profit developer converted an 1896 school that had been abandoned for 40 years into 42 housing units. The property is on the National Register of Historic Places. The former school now has 35 affordable housing units. The developer constructed seven market-rate units as a component of the project: a four-unit garden style building and a three-unit townhouse building.
- A for-profit developer converted a vacant, two-story elementary school into 50 units of housing targeted to seniors. Along with the adaptive reuse, the project entailed constructing a new three-story addition to the school building.



Lower Winter Street Apartments, PSH homeless, NeighborWorks Housing Solutions, Quincy, MA

- A nonprofit planned to convert three historic mill structures into 70 affordable housing units. The buildings, which are listed on the National Register of Historic Places, include a carriage repair and blacksmith shop built in 1874 and two buildings from 1875 and 1900 operated by a rubber manufacturing firm. Along with the housing, the project includes commercial and community space.
- A nonprofit created 19 permanent affordable housing units for people who have experienced chronic homelessness by converting a former school property. The school's gym and stage were preserved to be used for community-wide events.
- A nonprofit converted a long-vacant assisted living community into 86 units of permanent supportive housing for formerly homeless people.
- A for-profit developer converted a former four-story convent into 59 apartments for seniors, while creating an additional four units by converting a former carriage house into four townhomes. The oldest portion of the property dates to the 1890s.

NEW HOMES CREATED THROUGH ACQUISITION AND REHABILITATION

As reported to NLIHC, four states awarded \$3,689,430 in HTF to five projects categorized as "rehabilitation" or "acquisition and rehabilitation" projects, which further research showed would create 60 new affordable housing units (18 HTF-assisted).

The projects that would *create new units* include:

- A project to acquire a nine-bedroom single-family dwelling that will create five permanent rental units for single, unrelated homeless adults with severe mental illness.
- A project to acquire a vacant building, carry out gut rehabilitation, and create six one-bedroom units to provide permanent supportive housing for people who have experienced homelessness.
- A project to acquire a vacant home, carry out substantial rehabilitation, and create three units to provide permanent supportive housing for families with children that have experienced homelessness.
- A project to acquire and rehabilitate an existing two-bedroom family structure to create two rental units for extremely low-income households.
- A project to acquire an apartment building with 20 market-rate units into 40 affordable apartments providing permanent supportive housing for people experiencing chronic homelessness.

REHABILITATION ONLY

As best as NLIHC could determine, only one project fell under the category of “acquisition and rehabilitation” that might be a simple rehabilitation project. This project was anticipated to use \$897,217 in HTF funds for nine units, all HTF-assisted – meaning that the units must be affordable to extremely low-income households.



Shiloh Commons, General occupancy, Preservation, MHT Housing, Inc, Continental Management, Flint, MI



Shiloh Commons, General occupancy, Preservation, MHT Housing, Inc, Continental Management, Flint, MI

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' staffs provided detailed and seemingly complete information about sources of development financing, others 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.



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

- Low-Income Housing Tax Credits (LIHTCs): 135 projects in 45 states had 1,074 units assisted with 2019 HTF funds (1,315 total HTF-assisted units, including HTF from previous or subsequent HTF allocation years in these projects). Of these:
 - Thirty-five states awarded 9% LIHTCs to 78 projects with 441 units assisted with 2019 HTF funds (588 total HTF-assisted units, all HTF years in a project), with 10 states exclusively reporting 9% LIHTCs.
 - Thirty-four states awarded 4% LIHTCs to 55 projects with 622 units assisted with 2019 HTF funds (744 total HTF-assisted units, all HTF years in a project), with seven states exclusively reporting 4% LIHTCs.
 - Three states awarded both 9% and 4% LIHTCs to three projects with 11 units assisted with 2019 HTF funds (13 total HTF-assisted units, all HTF years in a project).
 - One state indicated two projects were financed with LIHTC but did not indicate whether 9% or 4% LIHTC was used.

By infusing LIHTC projects with HTF-assisted units, a small number of units in LIHTC projects (that had 5,179 units total, assisted and unassisted) will be more affordable to ELI households.

- No LIHTC: 34 projects in 20 states with 256 units assisted with 2019 HTF funds (331 total HTF-assisted units, all HTF years in a project)

- HOME: 62 projects in 33 states
- Affordable Housing Program (AHP) of the Federal Home Loan Banks: 32 projects in 24 states
- State and/or Local Housing Trust Funds: 44 projects in 22 states
- Other State or Local Programs: 90 projects in 35 states

Although NLIHC asked contacts in each state whether projects received private mortgages, contacts in many states did not offer this information. Of those that did, 37 states reported that 81 projects had conventional private mortgages. Another way to leverage private sources is through the deferred developer fee. Twenty-eight states reported that 69 projects used deferred developer fees as a resource. Fifteen states reported that 29 projects had equity provided by owners, sponsors, developers, or other parties. In addition, 22 states reported that 36 projects received grants from foundations, charities, and other private sources.

Miscellaneous other sources included the following: eight projects in seven states used federal or state historic tax credits; three projects in three states used federal Capital Magnet Fund; three projects in three states used federal Choice Neighborhoods Initiative funds; one project used federal New Markets Tax Credits; one project used Continuum of Care funds; one project used HOME-ARP (American Rescue Plan) funds; and one project used old Neighborhood Stabilization Funds (NSP). Three forms of Community Development Block Grant (CDBG) funds were used: traditional CDBG funds from the state or a local entitlement jurisdiction in eight projects in eight states; CDBG-DR (Disaster Recovery)

in one project; and CDBG-CV (Coronavirus) in two projects in two states. Four states reported that five projects received assistance from the *American Rescue Plan Act* (ARPA) program enacted during the COVID-19 pandemic.



White Oak Estates, PSH mental illness, Central Minnesota Housing Partnership, Baxter, MN



Pearl Senior Living Community, Seniors, Conversion of vacant motel, Gulf Coast Housing Partnership, Pearl Street Community Development Corporation, Jackson, MS

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). Unlike under the public housing or the Housing Choice Voucher programs, an ELI household's rent plus utility payment is not adjusted to their actual income. For example, households depending on Supplemental Security Income (SSI) payments typically have incomes at 20% AMI, meaning they could be living in an HTF-assisted home but be rent 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 shows 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 FMR areas, unless they also have rental assistance. Utilizing the federal poverty guideline to set maximum rents for HTF units is problematic. This policy disproportionately impacts larger, poorer households who already have greater



Trinity Apartments, 30 PSH homeless + 100 general occupancy, Homeward, Inc., Missoula, MT



Villa Rows, General occupancy, Holy Name Housing Corporation, Omaha, NE

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.

Florida’s policy since the beginning of the HTF program has been unique. Florida prioritizes applications that are able to 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 units with HTF. Florida structures HTF awards in order to “buy down” 60% AMI units to 22% AMI rents for an extended period. Because Florida’s stated policy is unique, a portion of its 2019 Annual Action Plan (as in previous years) is quoted here at length:

“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



434 Union Street, PSH homeless, Families in Transition, Manchester, NH

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."

According to their HTF Allocation Plans or requests for applications, the District of Columbia, Indiana, and Kentucky required applicants to have a commitment for Section 8 Project-Based Vouchers (PBVs) for HTF-assisted units. Kentucky also offers competitive points if at least 75% of the units in a project (including non-HTF-assisted units) have project-based rental assistance. Louisiana and New Jersey awarded HUD Project-Based Vouchers (PBVs) to all projects receiving HTF. North Carolina requires 10% of all units developed with LIHTC equity (a project can opt to reserve up to 20% of units) to be reserved for people with disabilities. These targeted units are eligible for Key Rental Assistance, a North Carolina-funded project-based rental assistance program.

Twenty states planned to provide competitive points to projects that had a commitment for PBVs. Among these states:

- **Alaska** offers eight points (out of 231) if at least 25% of the total units will have PBVs and specifies a 15-year term.
- **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 132) if 5% to 10% of a project's units have a firm commitment of federal or state project-based rental assistance, and eight points for more than 10%.



Alpine Street, PSH homeless families with children, Coming Home of Middlesex County and Perth Amboy YMCA, Perth Amboy, NJ

- **Delaware’s** NOFA indicates that applications eligible to receive new rental subsidy will receive priority consideration. In addition, Delaware offers at least 20 points (out of 100) over two scoring categories. However, the HTF Allocation Plan indicates that having project-based rental assistance is a “least important” priority.
- **Illinois** prioritizes applications that offer operating or project-based rental assistance and can award up to 25 points (out of 100) depending on the number of units assisted and the length of the assistance commitment:
 - If 1% to 10% of units are assisted, a project can receive five points for a commitment between five and 10 years, or 10 points for a commitment of 10 or more years.
 - If 10% to 50% of units are assisted, a project can receive seven points for a commitment between five and 10 years, or 15 points for a commitment of 10 or more years.
 - If 50% to 75% of units are assisted, a project can receive 10 points for a commitment between five and 10 years, or 20 points for a commitment of 10 or more years.
 - If more than 75% of units are assisted, a project can receive 15 points for a commitment between five and 10 years, or 25 points for a commitment of 10 or more years.
- **Maine** can provide 15 points (out of 100) if PBVs are provided by local public housing agencies, although the state indicates that it “may” also make PBVs available.



Suttons Lane, PSH families with special needs, Triple C Housing, Edison Township, NJ



Desert Hope, PSH chronically homeless, Mesilla Valley Community of Hope and Mesilla Valley Public Housing Authority, Las Cruces, NM

- **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 150) if an applicant has PBVs for up to 66% of a project's units from a local public housing agency for at least five years.
- **New Mexico** awards five points (out of 115) if an applicant has PBVs, but only if PBVs 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."
- **Ohio** offers 10 points if at least 25% of the units in a proposed project have rental assistance (not just PBVs), 15 points if at least 50% are rent-assisted, and 20 points if 100% are rent-assisted.
- **Oregon offers** up to five points (out of 100) if an application has federal Section 811 assistance for people with disabilities.
- **West Virginia** offers 15 points (out of 100) if an application has rental assistance (not just PBVs) for 25% but less than 50% of a project's total units, 20 points for 50% but less than 75% of all units, and 25 points for at least 75% of all units.

Six states indicated that HTF applicants with project-based rental assistance would be given "priority": Georgia, Hawai'i, Kansas, Maryland, Massachusetts, and Nevada (as well as Delaware and Illinois, as mentioned above in the discussion about points). Among the six, Massachusetts typically pairs HTF with the Massachusetts Rental Voucher Program (MVRP), a state-funded, voucher-type rental assistance program that also provides \$1,500 per unit to help with the cost of providing supportive services.



Villa del Norte, Preservation of Section 202 senior housing, New Mexico Housing and Community Development Authority, (subsidiary of the Truth or Consequences Housing Authority), Espanola, NM



Herkimer Gardens, Supportive Housing for Seniors, Federation of Organizations, Bedford-Stuyvesant, Brooklyn, NY, Photo: Chris Cooper / ArchExplorer

Three states had a “preference” for applicants with project-based rental assistance: Missouri, Rhode Island, and Tennessee. For 2019, 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 Project-Based Vouchers. Montana indicates an application will be “enhanced” if it has project-based rental assistance, while Michigan indicates that the availability of project-based rental assistance is among (unspecified) selection criterion. Colorado indicates an application “should” include project-based rental assistance if the project entails permanent supportive housing.



Pivot's Tiny Home Community, Youth, homeless or aging out of foster care, Pivot Inc., Oklahoma City, OK



The Villages at A New Leaf, PSH developmental disabilities, A New Leaf Inc., Owasso, OK



Atcheson Place Lofts, General occupancy, Housing Services Alliance, Columbus, OH

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 third-level priority out of five priority levels, and Nebraska set aside \$500,000 for rural Continuums of Care. Six states award points for rural projects: Alabama (five points out of 100), Alaska (20 "small community" points out of 231), New Mexico (10 points out of 115), Tennessee (five points out of 100), Utah (two points out of 50), and Wisconsin (five points out of 80).

Although NLIHC is not confident that all states reported which of their projects were in rural areas, 17 states reported 29 projects in rural areas receiving \$23,454,880 in 2019 HTF funds (\$33,627,822 in total HTF funds from previous and/or subsequent years' allocations). These projects contained 1,348 units (152 HTF-assisted units with 2019 HTF funds, and 220 HTF-assisted units if not prorated to reflect HTF from other years' allocations).



Patriot Heights, General occupancy, 14 three-bedroom and 2 four-bedroom units, CASA of Oregon and Umatilla County Housing Authority, Stanfield, OR



Centennial Place Apartments, Families with youth at risk of homelessness, and units for people with mental illness, Housing Development Center and Cascadia Behavioral Healthcare, Photo by Josh Partee, courtesy of Scott Edwards Architecture, Portland, OR



Jeremiah Village, Seven units for higher-functioning adults on autism spectrum, general occupancy for remaining units, Glade Run Lutheran Services and TREK Development Group, Zelienople, PA

FORM OF ASSISTANCE

The HTF regulations offer states a wide range of options regarding the form of HTF assistance they can provide to projects:

- Six states' HTF Allocation Plans or RFPs/NOFAs indicated that they provide HTF assistance in the form of grants: Alabama, Arkansas, Indiana, Montana, Oregon, and Tennessee. Honolulu, a Hawai'i subrecipient, also provides grants.
- Three states 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; Connecticut provides grants, non-interest bearing accounts, or deferred payment loans; and Idaho provides grants or 1% loans to nonprofits and 3% loans to for-profits.



The Willows at East Greenfield, General occupancy, Adaptive reuse, Genesis Housing Corporation and Ingerman Development, East Greenville, PA

- Four states indicated that they provide zero-interest, deferred loans: Massachusetts, New Hampshire, New York, and Ohio.
- Five states indicated that they provide forgivable loans: Florida, Kentucky (for nonprofits), New Mexico (for projects not using LIHTC), Oklahoma (zero interest), and Texas. South Carolina might offer a forgivable loan or a loan with interest.
- Five states indicated that they provide deferred payment loans: Delaware (could be interest-bearing or non-interest-bearing), Kansas, Kentucky (for-profits), Nebraska, and Virginia (at 3% interest).
- Six states indicate that they provide "cash flow loans": the District of Columbia (at 0%-3%), Michigan (at 1%), Mississippi, New Mexico (non-interest-bearing if a project has LIHTC), South Carolina (0%-3%), and Wisconsin (at 3%).
- California provides loans at 3% interest. Washington provides loans at simple interest of 1% with all principal and interest due at the end of the 50-year loan period for projects that have 50% of the units' income and rent restricted and reserved for people experiencing homelessness or for projects that provide permanent supportive housing. All other Washington projects have 1% to 3% interest amortized over 40 to 50 years.

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, five 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). Pennsylvania underwrites application for 35 years. Florida requires HTF-assisted units to still be “affordable” at 60% AMI for an additional 20 years after the HTF-required 30-year minimum.

Projects in Vermont 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).

Sixteen states mentioned points for affordability periods greater than 30 years:

- The District of Columbia awarded five points (out of 195) for perpetual affordability.
- Arkansas awarded 10 points (out of 50) for perpetual affordability, five points if five years beyond 30 years.



Pine View Apartments, General occupancy, Women’s Development Corporation, Photo by Union Studio Architects, Exeter, RI



Sutton Street Apartments, General occupancy, Preservation, One Neighborhood Builders, East Providence, RI

- Rhode Island awarded up to five points (out of 130) for affordability periods in 10-year increments greater than 30 years: three points if one to 10 years, four points if 11-20 years, and five points if 21 or more years.
- Wyoming awarded up to 35 (out of 451) points 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: Oklahoma (five points out of 52) and South Dakota (30 points out of 965).
- Greater than 35 years: Connecticut (10 points out of 132).
- 35 years: Louisiana (four points out of 100) and Mississippi (five points out of 100).
- Greater than 30 years: Alabama (five points out of 100), New Hampshire (five points out of 150), New Jersey (three points out of 100), New Mexico (five points out of 115), New York (15 points out of 100), and North Dakota (one point out of 155).
- Arizona applications “might receive points in scoring” if greater than 30 years.



Pleasant Place, Three-bedroom general occupancy, FourSix Development, Lexington, SC



Church Street Place at Poe Mill, PSH chronically homeless with mental illness, United Housing Connections, Greenville, SC



Buchanan Campus, PSH youth at risk of homelessness, focus on youth aging out of foster care, (Youth care for homeless cats and dogs, learn pet grooming), Crossroads Campus, Nashville, TN

Other incentives for affordability periods greater than 30 years include:

- Minnesota had a “preference” for applications with an affordability period of 35 or 40 years.
- 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 fifth level of funding priority.
- Delaware applications “may” receive additional credit for an affordability period greater than 30 years.



Burnet Place Apartments, PSH homeless living with AIDS, Project Transitions, Photo by Kristian Alvelo/@kalveo, Austin, TX



East 72, General occupancy, Housing Connect (Housing Authority of Salt Lake County), Midvale, UT

MAXIMUM AMOUNT OF 2019 HOUSING TRUST FUND PER PROJECT

According to their HTF Allocation Plans or RFPs/NOFAs, 18 states established maximum amounts of HTF assistance per project. Seven states had maximums greater than \$1 million: Alabama (\$1,350,000), Mississippi (\$1,500,000), New Hampshire (\$1,500,000), New Mexico (\$1,500,000 for projects not also assisted with LIHTC), Oklahoma (\$1,000,000 plus \$350,000 for operating reserve), Pennsylvania (\$1,200,000), and Texas (\$2,000,000). Four states had \$1 million-per-project maximums: Arkansas, Massachusetts, North Carolina, and Utah. Maine and Tennessee had \$900,000 maximums. Ohio's cap was \$750,000 if a project did not seek LIHTC, and \$500,000 if a project sought 4% LIHTC with bond financing. Virginia's maximum was \$800,000 per special needs project; otherwise, the cap was \$700,000. Indiana had a \$500,000 maximum, and New Mexico's maximum for LIHTC-financed projects was \$400,000. South Dakota limited per-project HTF assistance to 20% of the state's allocation to any project and 25% to any one developer or sponsor.



New Avenue Apartments, PSH homeless, RuralEdge, St. Johnsbury, VT



Lincoln Place, PSH chronically homeless, Adaptive reuse, Housing Trust of Rutland County, Rutland, VT

CONCLUSION

In 2019 – the fourth year of HTF implementation – states appear to have maintained the course set in 2016. States continued to use most of their HTF resources (74%) 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 (65) included three or more bedrooms to serve large households, a segment of the ELL 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 2019 HTF allocation – \$166 million (74%) – was used to construct new affordable housing units. Another \$9.9 million was used for adaptive reuse projects, creating more affordable housing in properties previously used for non-housing purposes. In addition, although also reported to HUD as “rehabilitation,” NLIHC research showed that another five projects used \$3.7 million to also create new affordable housing. Meanwhile, \$43.5 million of HTF was used to preserve existing affordable housing, helping to ensure that this stock does not revert to market-rate housing. Of that \$43.5 million, nearly \$22.5 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.



Cool Lane Commons, PSH homeless, Adaptive reuse, Virginia Supportive Housing, Richmond, VA



Kindlewood Phase 1, General occupancy, Piedmont Housing Alliance, Charlottesville, VA

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 HTF was used as gap financing for 135 projects also using the Low-Income Housing Tax Credit (LIHTC) program's equity investments in 2019, meaning that some units in LIHTC projects will serve extremely low-income households. It is interesting to note that 34 projects in 20 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.

NLIHC's qualitative review of each state's 2019 HTF Allocation Plan 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 are written for developers seeking HTF funds. An additional qualitative review of each state's 2024 website found that 18 states did not have a hyperlink to their HTF program, and 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.



Island Center Homes, PSH mentally ill, intellectual disabilities, homeless, Vashon HouseHold, Vashon, WA



Post Glen Apartments, General occupancy, Preservation, West Virginia Rural Preservation, Oceana, WV



Sewell Landing, General occupancy, Preservation, West Virginia Rural Preservation, Rainelle, WV

APPENDICES

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

As indicated by information provided by states in their 2019 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 section of the report highlights states with such policies or set-asides.

MIXED 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 the following: eight points (out of 231) if 50% of a project's units are targeted to people with "severe" special needs; three points if a project incorporates substantive social services; three points if an application proposes substantive, service-enriched housing through hard set-aside units for people experiencing homelessness or who have a disability; and eight points if 25% of a project's units are "equipped" for people with physical disabilities.

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 Annual Action Plan notes that Permanent Supportive Housing is a high priority need and that additional supportive housing is needed for people with mental, physical, and developmental disabilities, people with alcoholism or other addictions, and persons with HIV/AIDS and their families. The 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 disabilities. For 2019, that

20% amounted to \$600,000. The 2019 HTF NOFA states that all projects must meet Delaware's definition of permanent supportive housing. Furthermore, the NOFA indicates that the state set aside of \$600,000 is for new permanent supportive housing projects for people experiencing chronic homelessness who have disabilities or people with disabilities who are not experiencing chronic homelessness. The NOFA also indicates that applications will get preference if they provide PSH for the following: people experiencing chronic homelessness who have mental health disabilities or who suffer from substance abuse disorder, people experiencing chronic homelessness, or people with disabilities, particularly people with disabilities at high risk of homelessness or institutionalization. Finally, the NOFA can award some portion of a 30-point category for projects that serve people experiencing chronic homelessness who have mental health disabilities or substance abuse disorder.

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 have a minimum of 50% of total units affordable at or less than 30% of AMI for supportive housing populations. In addition, at least 10% of the units must be from Illinois's Statewide Referral Network (SRN). Supportive housing populations are those with a household head who is living with a disability, or households experiencing or at risk of homelessness that need access to supportive services in order to maintain housing. Members of this population must have income less than or equal to 30% AMI. Illinois can award five points (out of 100) for 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. Applications can also receive up to 15 points for various Universal Design elements. This Illinois RFA is limited to projects that do not seek LIHTC and that will have 25 or fewer units.

Kansas provides 20 points (out of 310) in its LIHTC Qualified Allocation Plan (QAP) if 100% of a project's units are to be occupied by people with special needs.

Louisiana can provide points for projects that will provide supportive services for one of four special needs populations: homeless, disabled, single-parent household, or veteran. 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%.

Massachusetts prioritizes using HTF funds for projects that will provide service-enriched housing and housing for individuals and families experiencing homelessness. The HTF Allocation Plan indicates that the state anticipated allocating at least half of its 2019 HTF allocation for units assisting people experiencing homelessness. To help fund supportive services, the state can provide up to \$1,500 annually through the Massachusetts Rental Voucher Program (MRVP). Elsewhere in the HTF Allocation Plan, the state indicates that it will give priority to projects with tenant selection plans that include a preference for: homeless families, homeless individuals, veterans, persons with disabilities, or other vulnerable populations, such as the frail elderly.

Mississippi prioritizes people experiencing homelessness, people with HIV/AIDS, people with mental illness, and people with physical disabilities. HTF-assisted units will be designated for Special Needs Housing. Projects awarded HTF must designate at least 10% of HTF-assisted units for people experiencing homelessness or who have a mental disability. Applications can receive five points (out of 100) based on preventing, reducing, or expanding permanent housing for people with serious mental illness or experiencing homelessness. Applicants must commit to providing a minimum of two community services.

Missouri maintains a preference for applications that set aside 10% of total units for people experiencing homelessness, people with disabilities (not specified), domestic violence survivors, and youth aging out of foster care. The state also maintains a preference for service-enriched housing. Missouri prioritizes housing combined with social services to help stabilize residents and foster independent living.

Montana states that an application's score "will be enhanced" if it addresses the needs of people experiencing homelessness, who have a disability, or who are elderly.

Nebraska sets aside roughly 55% of its HTF allocation for a "Permanent Housing Set Aside" for projects serving people who are experiencing homelessness, are at risk of homelessness, or who have some other special need.

Nevada provides points for the percentage of units in a project that will be targeted for special needs populations: five points (out of 62) if 50% of units are targeted, eight points if 80% are targeted, and 11 points if 100% are targeted. In addition, a project can receive up to 25 points depending on the nature and depth of supportive services that are provided. Special needs categories include the following: chronic mental illness, chronic chemical dependency, physical and/or developmental disability, experiencing long-term homelessness or being at risk of homelessness, and being among the frail elderly.

New Hampshire maintains a preference for serving people with a disability, people who are experiencing chronic or non-chronic homelessness, veterans, and people who are recovering from mental illness or a substance abuse disorder. The state has two types of HTF RFPs. (See the "People Experiencing Homelessness" section below for information about the second type). For projects that intend to blend HTF with LIHTC, 15 points (out of 150) are awarded if every unit provides supportive housing for people experiencing homelessness or who are at risk of homelessness or for veterans, and a project can receive five points if it reserves at least 10% or more of its units for supportive housing for people experiencing homelessness or at risk of homelessness and for veterans.

New Jersey only awards HTF funds to projects providing housing to special needs households. The state will award an unspecified number of points to applications from organizations that indicate a robust record of serving a designated special needs population and that provide a social service plan. Special needs populations include the following: people with mental illness, people with physical or developmental disabilities, domestic violence survivors, youth aging out of foster care, runaway and homeless youth, individuals and families experiencing homelessness, disabled and homeless veterans, persons with HIV/AIDS, and people re-entering the community after incarceration.

New Mexico can provide up to 20 points (out of 115) to any special needs population: four points if 10% of HTF units are targeted, eight points if 20% of HTF units are targeted, and 12 points if 30% of HTF units are targeted. Special needs populations include the following: elderly or frail elderly, 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 can provide up to 20 points (out of 100) 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 projects to target 10% of total units for people experiencing homelessness and people with disabilities.

North Dakota can award up to 20 points (out of 155) to PSH applications with units set aside for people with special needs. Five points can be awarded if 10% of a project’s total units are set aside, eight points if 15% are set aside, and 11 points if 20% are set aside. In addition, up to nine points can be awarded to a project based on the number of hours per day and number of days per week for which supportive services are provided.

Oklahoma can provide 10 points (out of 52) to a project that dedicates at least 10% of the total units for special needs populations. An additional five points can be awarded for applications providing access to supportive services. Special needs populations include the following: people experiencing homelessness, youth aging out of foster care, veterans, and people with mental or physical disabilities.

South Carolina can award two points (out of 70) for applications designating at least 10% of total units for people experiencing homelessness, people who have a disability (not specified), or people who have other special needs.

South Dakota has a \$600,000 set-aside for special needs projects and can award up to 40 points (out of 965) for projects that provide on-site services. Special needs populations include the following: people experiencing homelessness, people with physical or mental disabilities, people with developmental disabilities, and elderly people.

Utah prioritizes elderly, disabled, and homeless people. The state can award two points (out of a probable 50) for each unit set aside for residents who are experiencing homelessness, who have a disability, or who are elderly.

Vermont simply asks applicants to indicate whether a project will limit occupancy or give preference to people experiencing homelessness, people with physical or mental disabilities, domestic violence survivors, frail elderly, or veterans. (See also “People Experiencing Homelessness” below)

Virginia gives (unspecified) scoring preference to projects that target special needs populations.

Wisconsin awards 20 points (out of 110) for projects with at least 25% of the units serving people experiencing homelessness and/or veterans requiring supportive services.

PEOPLE EXPERIENCING HOMELESSNESS

Alaska can award one point (out of 231) if an applicant gives a preference to a household experiencing homelessness.

Arizona’s HTF Allocation Plan and Annual Action Plan do not indicate a particular priority. The Allocation Plan is very developer-oriented; to identify a scoring policy, one must refer to the LIHTC QAP. Arizona also issued a separate NOFA for Supportive Housing Developments for Persons who are Homeless that includes HTF funds. Funds from the NOFA would be available to nonprofit-developed projects that reserve at least 50% of the total units for households experiencing homelessness. All three of the projects awarded

2019 HTF funds were PSH for those experiencing chronic homelessness.

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.” In addition, projects received competitive points depending on the percentage of total project units restricted to supportive housing. The points ranged from five points (out of 150) if 5% of the total units are restricted to supportive housing, up to 25 points, increasing in 5% increments, for projects with 30% of the units restricted to supportive housing.

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 competitive points (out of 132) if a project has or can secure PBVs for 10% to 20% of total units for households experiencing homelessness, and five points for those with 5% to 10% of units serving this population.

Delaware's Annual Action Plan notes that Permanent Supportive Housing is a high-priority need and that additional supportive housing is needed for people with mental, physical, and developmental disabilities, people with alcoholism or other addictions, and persons with HIV/AIDS and their families. The 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 disabilities. For 2019, that 20% amounted to \$600,000. The 2019 HTF NOFA states that all projects must meet Delaware's definition of permanent supportive housing. Furthermore, the NOFA indicates that the state set aside of \$600,000 is for new permanent supportive housing projects for people experiencing chronic homelessness who have disabilities or people with disabilities who are not experiencing chronic homelessness. The NOFA also indicates that applications will get preference if they provide PSH for the following: people experiencing chronic homelessness who have mental health disabilities or who suffer from substance abuse disorder, people experiencing chronic homelessness, or people with disabilities, particularly people with disabilities at high risk of homelessness or institutionalization. Finally, the NOFA can award some portion of a 30-point category for projects that serve people experiencing chronic homelessness who have mental health disabilities or substance abuse disorder.

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

Honolulu, Hawai'i gives priority to "Housing First" projects.

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 have a minimum of 50% of total units affordable at or less than 30% of AMI for supportive housing populations. In addition, at least 10% of the units must be from Illinois's Statewide Referral Network (SRN). Supportive housing populations are those with a household head who is living with a disability or households experiencing or at risk of homelessness that need access to supportive services in order to maintain housing. Members of this population must have income less than or equal to 30% AMI. Illinois can award five points (out of 100) for 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. Applications can also receive up to 15 points for various Universal Design elements. This Illinois RFA is limited to projects that do not seek LIHTC and that will have 25 or fewer units.

Indiana allocated an unspecified portion of its 2019 HTF allocation for PSH for people experiencing homelessness. HTF would only be awarded to projects that have completed the state's 2019 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.

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

Massachusetts prioritizes using HTF funds for projects that will provide service-enriched housing and housing for individuals and families experiencing homelessness. The HTF Allocation Plan indicates that the state anticipated allocating at least half of its 2019 HTF allocation for units assisting people experiencing homelessness. To help fund supportive services, the state can provide up to \$1,500 annually through the Massachusetts Rental Voucher Program (MRVP). Elsewhere in the HTF Allocation Plan, the state indicates that it will give priority to projects with tenant selection plans that include a preference for homeless families, homeless individuals, veterans, persons with disabilities, or other vulnerable populations, such as the frail elderly.

Mississippi prioritizes addressing homelessness with its HTF funds and will use HTF to support strategies to end chronic homelessness. Projects awarded HTF must designate at least 10% of HTF-assisted units for people experiencing homelessness or who have a mental disability. Applications can receive five points (out of 100) based on preventing, reducing, or expanding permanent housing for people experiencing homelessness or people with serious mental illness. Projects that provide housing for those experiencing homelessness can receive 10 points (out of 100).

Missouri maintains a preference for applications that set aside 10% of total units for people experiencing homelessness.

Montana indicates that an application's chance of success "will be enhanced" if it has a preference for housing families experiencing homelessness or who are at risk of homelessness.

Nebraska sets aside roughly 55% 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 a portion of its HTF allocation for an RFP for projects not seeking LIHTC that will provide supportive housing, giving priority to people experiencing homelessness. The RFP will provide 20 points (out of 125) for projects prioritizing people experiencing homelessness and 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.

North Carolina requires all LIHTC projects to target 10% of total units for people experiencing homelessness and people with disabilities.

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 a project 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 awards 20 points (out of 110) for projects with at least 25% of the units serving people experiencing homelessness and/or veterans requiring supportive services.

PEOPLE WITH DISABILITIES

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 Annual Action Plan notes that Permanent Supportive Housing is a high priority need and that additional supportive housing is needed for people with mental, physical, and developmental disabilities, people with alcoholism or other addictions, and persons with HIV/AIDS and their families. The 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 disabilities. For 2019, that 20% amounted to \$600,000. The 2019 HTF NOFA states that all projects must meet Delaware's definition of permanent supportive housing. Furthermore, the NOFA indicates that the state set-aside of \$600,000 is for new permanent supportive housing projects for people experiencing chronic homelessness who have disabilities or people with disabilities who are not experiencing chronic homelessness. The NOFA also indicates that applications will get preference if they will provide PSH for the following: people experiencing chronic homelessness who have mental health disabilities or who suffer from substance abuse disorder, people experiencing chronic homelessness, or people with disabilities, particularly

people with disabilities at high risk of homelessness or institutionalization. Finally, the NOFA can award some portion of a 30-point category for projects that serve people experiencing chronic homelessness who have mental health disabilities or substance abuse disorder.

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 have a minimum of 50% of total units affordable at or less than 30% of AMI for supportive housing populations. In addition, at least 10% of the units must be from Illinois's Statewide Referral Network (SRN). Supportive housing populations are those with a household head who is living with a disability or households experiencing or at risk of homelessness that need access to supportive services in order to maintain housing. Members of this population must have income less than or equal to 30% AMI. Illinois can award five points (out of 100) for 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. Applications can also receive up to 15 points for various Universal Design elements. This Illinois RFA is limited to projects that do not seek LIHTC and that will have 25 or fewer units.

Maine requires applicants to accept Section 811 Project Rental Assistance (PRA) for people with disabilities if the state makes the assistance available.

Mississippi requires projects awarded HTF to designate at least 10% of HTF-assisted units for people who have serious mental illness who will be connected with supportive services or who are experiencing homelessness. Applications can receive five points (out of 100) based on preventing, reducing, or expanding permanent housing for people with serious mental illness or people experiencing homelessness. Applications can receive 20 points for units serving people with serious mental illness based on three priority levels: for example, priority level one is for people discharged from a state psychiatric hospital or after a stay of more than 90 days or people discharged from a nursing facility with intellectual disabilities after a stay of more than 90 days. In addition, up to 20 points will be awarded to developments that set aside a minimum of 10% but no more than 20% of the project's units for people targeted by the Mississippi Affirmative Olmstead Initiative.

Missouri has two set-aside preferences, one of which is "Special Needs Priority," for which Missouri "strongly encourages" developers to apply. Developments will be awarded preference in funding if an application commits setting aside at least 10% of total units for people with physical, emotional, or mental impairments, or who are diagnosed with mental illness, or who are developmentally disabled.

Following **North Carolina's** 2012 Olmstead settlement agreement with the U.S. Department of Justice, units for mobility-impaired people in the state must help residents be integrated into the general community. The state also requires all LIHTC applications to set aside a minimum of 10% of the

total units for people with disabilities or people experiencing homelessness. These units will be eligible for the state-funded project-based rental assistance program known as Key Rental Assistance.

North Dakota can provide up to 12 points (out of 155) for properties that meet minimum Universal Design features.

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

South Dakota can provide up to 30 points (out of 965) for projects with 20% to 25% of the units assisted with Section 811 Rental Assistance for people 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.

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

PERMANENT SUPPORTIVE HOUSING

Alaska can award three points (out of 231) if an application proposes substantive, service-enriched housing through hard set-aside units for people experiencing homelessness or who have a disability.

Arizona's HTF Allocation Plan and Annual Action Plan do not indicate a particular priority. The Allocation Plan is very developer-oriented; to identify a scoring policy, one must refer to the LIHTC QAP. Arizona also issued a separate NOFA for Supportive Housing Developments for Persons who are Homeless that includes HTF funds. Funds from the NOFA would be available to nonprofit-developed projects that reserve at least 50% of the total units for households experiencing homelessness. All three of the projects awarded 2019 HTF funds were PSH for those experiencing chronic homelessness.

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." In addition, projects received competitive points depending on the percentage of total project units restricted to supportive housing. The points ranged from five points (out of 150) if 5% of the total units are restricted to supportive housing, up to 25 points, increasing in 5% increments, for projects with 30% of the units restricted to supportive housing.

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

Delaware's Annual Action Plan notes that Permanent Supportive Housing is a high priority need and that additional supportive housing is needed for people with mental, physical, and developmental disabilities, people with alcoholism or other addictions, and persons with HIV/AIDS and their families. The 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 disabilities. For 2019, that 20% amounted to \$600,000. The 2019 HTF NOFA states that all projects must meet Delaware's definition of permanent supportive housing. Furthermore, the NOFA indicates that the state set-aside of \$600,000 is for new permanent supportive housing projects for people experiencing chronic homelessness who have disabilities or people with disabilities who are not experiencing chronic homelessness. The NOFA also indicates that applications will get preference if they will provide PSH for the following: people experiencing chronic homelessness who have mental health disabilities or who suffer from substance abuse disorder, people experiencing chronic homelessness, or people with disabilities, particularly people with disabilities at high risk of homelessness or institutionalization. Finally, the NOFA can award some portion of a 30-point category for projects that serve people experiencing chronic homelessness who have mental health disabilities or substance abuse disorder.

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 have a minimum of 50% of total units affordable at or less than 30% of AMI for supportive housing populations. In addition, at least 10% of the units must be from Illinois's Statewide Referral Network (SRN). Supportive housing populations are those with a household head who is living with a disability or households experiencing or at risk of homelessness that need access to supportive services in order to maintain housing. Members of this population must have income less than or equal to 30% AMI. Illinois can award five points (out of 100) for 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. Applications can also receive up to 15 points for various Universal Design elements. This Illinois RFA is limited to projects that do not seek LIHTC and that will have 25 or fewer units.

Indiana allocated an unspecified portion of its 2019 HTF allocation for PSH for people experiencing homelessness. HTF would only be awarded to projects that have completed the state's 2019 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 prioritizes using HTF funds for projects that will provide service-enriched housing and housing for individuals and families experiencing homelessness. The HTF Allocation Plan indicates that the state anticipated allocating at least half of its 2019 HTF allocation for units assisting people experiencing homelessness. To help fund supportive services, the state can provide up to \$1,500 annually through the

Massachusetts Rental Voucher Program (MRVP). Elsewhere in the HTF Allocation Plan, the state indicates that it will give priority to projects with tenant selection plans that include a preference for the following: homeless families, homeless individuals, veterans, persons with disabilities, or other vulnerable populations, such as the frail elderly.

New York can provide up to 20 points (out of 100) 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 Dakota can award up to 20 points (out of 155) to PSH applications with units set aside for people with special needs. Five points can be awarded if 10% of a project's total units are set aside, eight points if 15% are set aside, and 11 points if 20% are set aside. In addition, up to nine points can be awarded to a project based on the number of hours per day and number of days per week for which supportive services are provided.

Vermont has a preference for permanent supportive housing with rental assistance and support services for people experiencing homelessness or who are at risk of homelessness.

APPENDIX B: HOUSING TRUST FUND ALLOCATION PLAN/ANNUAL ACTION PLAN QUALITY

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 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 maintains that HTF Allocation Plans should be easy for the general public to read, and that they should provide detailed information about states' priorities for helping provide 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, which all SDEs use as a component of their Consolidated Plan Annual Action Plan submissions through CPD's Integrated Disbursement and Information System (IDIS). This HTF component is included at the end of most Annual Action Plans at "AP-90 Program Specific Requirements," under "Housing Trust Fund (HTF)".

Some states develop an actual HTF Allocation Plan separate from and in addition to the IDIS submission. These 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 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 findings.

NLIHC assigned an “A” letter grade to the HTF Allocation Plans of the following states: Alabama, Florida, Massachusetts, Mississippi, North Dakota, South Dakota, Vermont, and Wisconsin. These HTF Allocation Plans generally offer 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 the following states or jurisdictions: Alaska, District of Columbia, Indiana, Louisiana, Maryland, Missouri, New Hampshire, New Jersey, New Mexico, North Carolina, Ohio, and Utah and two of Hawai’i’s subrecipients (the City and County of Honolulu and the County of Hawai’i*). 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 the state prioritizes, or indicating points, set-asides, or preferences for such populations), or explaining how the 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 of Hawai’i’s subrecipients (Kaua’i and Maui). These plans met the minimum requirements of the OAHF 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 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 HUD’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 said so, 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: HOUSING TRUST FUND INFORMATION ON STATE 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.

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 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 for those visiting it. Most SDE websites have a section that can clue page visitors 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 constructed 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 subrecipient 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.
 - 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, 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, and 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, which 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; one has to 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, and 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, one has to 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.



National Low Income Housing Coalition
 1000 Vermont Avenue, N.W. | Suite 500
 Washington, D.C.