Analysis of State Qualified Allocation Plans for the Low-Income Housing Tax Credit Program

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Foreword

This report continues a 25-year PD&R tradition of conducting research on housing planning requirements. It also marks one more addition to HUD's expanding library of information about the Low Income Housing Tax Credit program (LIHTC). This report is being released simultaneously with a complementary report on housing planning: "Planning to Meet Local Housing Needs: The Role of HUD's Consolidated Planning Requirements in the 1990s". Both reports review the implementation of federally mandated planning requirements in the 1990s. This report looks at state prepared Qualified Allocation Plans (QAPs) for the Low Income Housing Tax Credit program, while the other looks at locally prepared Comprehensive Housing Affordability Strategies (CHAS)/Consolidated Plans that carry out the purposes of the National Affordable Housing Act.

LIHTC, managed by the Department of Treasury's Internal Revenue Service, is currently the largest source of federal subsidy for adding new or rehabilitated rental housing units to the affordable housing stock in the United States. Between 1987 and 2000, equity raised through the tax credit program facilitated the creation or rehabilitation of over 1.1 million housing units affordable to persons and families with incomes at or below 60 percent of HUD Area Median Family Income. Congress recently increased each state's annual per capita tax credit allocation by 40 percent, which should cause annual production to increase significantly in the next 2 to 3 years.

The Qualified Allocation Plan is a federally mandated planning requirement that states annually use to explain the basis upon which they distribute their LIHTC allocations. Based on their QAP, states establish preferences and set-asides within their tax credit competitions so as to target the credits towards specific places (such as rural areas) or types of people (such as elderly households). This report examines how those preferences and set-asides were used and changed based on content analysis of 1990 and 2000 Qualified Allocation Plans from nearly every state along with discussions with the staff that prepared the plans.

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1. INTRODUCTION AND OVERVIEW

Every year, the Internal Revenue Service (IRS) requires that the state agencies responsible for awarding federal Low Income Housing Tax Credits (LIHTCs) submit updated plans that outline the bases upon which they distribute their allocations. The federal code allows states the flexibility to assess needs, identify preferences, and establish policies for the allocation of tax credit resources. To better understand these state policies, the Department of Housing and Urban Development commissioned the Urban Institute to analyze Qualified Allocation Plans (QAPs) for all fifty states.[1]

States typically use two mechanisms to guide the allocation of tax credits—preferences and set-asides. In the context of the LIHTC program, preferences consist of housing priorities that are operationalized when state allocation agencies 'score' projects that are competing for tax credits and award extra points to projects with desired characteristics.[2] Set-asides are funds that are set aside every year from a state's allocation pool and dedicated to specific types of projects. For example, federal law requires that states set aside 10 percent of their total allocation every year for projects sponsored by non-profit organizations. Many states specify additional set-asides to target housing needs. Appendix B gives detailed information on the weight that states assigned to their preferences and set-asides in both 1990 and 2001. We report mean values of preferences and set-aside scores for all 50 states when describing the characteristics of the QAP provisions in Section 2.

Based on a systematic review of QAPs, this report describes both the preferences and the set-asides states have adopted to guide the allocation of LIHTC resources over the course of the 1990s. More specifically, we reviewed each state's QAP for 1990, 2000, and 2001, and recorded both set-asides and preferences in each of eight basic categories:[3]

1. Geographic location
2. Local housing needs
3. Financing
4. Resident characteristics

[1] This analysis also includes Chicago, which receives its own allocation of tax credits and produces it own QAP, independent of the State of Illinois.

[2] In some states, conventional point systems are not employed to evaluate projects. In states that do not use point systems, the QAPs must have explicitly stated their preferences and identified them as such for them to have been recorded in the database.

[3] See appendix A for the complete content analysis format and Appendix B for a state-by-state tabulation of set-asides and preferences.

5. Project activities and types
6. Building characteristics
7. Sponsorship and costs
8. Affordability

The 1990 QAPs established a baseline from which to analyze change over the 1990s, and represented a point at which the LIHTC program was still fairly new. The 1990 and 2001 QAPs bookended a respectable time period over which to draw comparisons. Analyzing both the 2000 and 2001 QAPs helped assure that the more recent QAP preferences and set-asides did not represent short-term fluctuations in policy that changed from year-to-year, but rather were the products of stable policy trends. Exhibit 1 lists the states and years for which the analysis was completed.

Exhibit 1: Allocation Plans Included in this Report

	1990	***2001***		***1990***	***2001***		***1990***	***2001***
Alabama		**X**	Kentucky	**X**	**X**	North Dakota	**X**	**X**
Alaska	**X**	**X**	Louisiana	**X**	**X**	Ohio	**X**	**X**
Arizona	**X**	**X**	Maine		**X**	Oklahoma	**X**	**X**
Arkansas		**X**	Maryland	**X**	**X**	Oregon	**X**	**X**
California		**X**	Massachusetts	**X**	**X**	Pennsylvania	**X**	**X**
Chicago	**X**	**X**	Michigan	**X**	**X**	Rhode Island	**X**	**X**
Colorado	**X**	**X**	Minnesota	**X**	**X**	South Carolina	**X**	**X**
Connecticut	**X**	**X**	Mississippi	**X**	**X**	South Dakota	**X**	**X**
Delaware	**X**	**X**	Missouri	**X**	**X**	Tennessee	**X**	**X**
Florida	**X**	**X**	Montana	**X**	**X**	Texas	**X**	**X**
Georgia	**X**	**X**	Nebraska	**X**	**X**	Utah	**X**	**X**
Hawaii	**X**	**X**	Nevada	**X**	**X**	Vermont	**X**	**X**
Idaho	**X**	**X**	New Hampshire	**X**	**X**	Virginia	**X**	**X**
Illinois	**X**	**X**	New Jersey	**X**	**X**	Washington	**X**	**X**
Indiana	**X**	**X**	New Mexico	**X**	**X**	West Virginia	**X**	**X**
Iowa	**X**	**X**	New York	**X**	**X**	Wisconsin	**X**	**X**
Kansas	**X**	**X**	North Carolina	**X**	**X**	Wyoming	**X**	**X**

Note: State housing finance agencies in Alabama, Arkansas, California and Maine did not provide copies of their 1990 QAPs. Also, Chicago has been included in the study because it is a home-rule city that receives its own allocation separate from the State of Illinois. 1990 QAPs could not be secured for Colorado, North Carolina, and Ohio so 1991 QAPs were used in the analysis as substitutes. Similarly, Mississippi's 2000 QAP was utilized for the analysis because a 2001 QAP could not be acquired from the state.

After recording state preferences and set-asides, we conducted telephone interviews with staff of each state allocation agency to confirm findings and/or clarify QAP provisions. A major goal of these calls was also to ask agency representatives about the changes we recorded from 1990 and 2001, and to find out whether there were set-asides or preferences that 'came and went' in the intervening years. Unfortunately, only a handful of the staff we interviewed had been with their respective housing finance agencies longer than four to five years. Therefore, virtually no one could speak to changes since the start of the 1990s.[4]

Section 2 of this report describes the preferences and set-asides established by states in each of the categories listed above, and documents patterns of change over the course of the 1990s. The most common preferences established in states' Qualified Allocation Plans were designed to encourage development that was located in rural areas or that contributed to community revitalization efforts, that leveraged funding from other government programs, that served special needs populations, and that extended affordability periods beyond federally mandated requirements. Over the course of the 1990s, the number of states with preferences or set-asides increased for almost all of the categories. Changes in QAPs generally reflected efforts by states to make their priorities more explicit and precise, or to incorporate new requirements mandated federally.

Section 3 explores possible linkages between state allocation policies and statewide measures of housing needs on the one hand, and the characteristics of LIHTC units actually built on the other. More specifically, we used 1990 census data to assess the extent to which specific preferences or set-asides were associated with corresponding indicators of housing needs.[5] And we compared the characteristics of LIHTC units brought into service between 1988 and 1998[6] to assess the extent to which specific preferences or set-asides have influenced the characteristics of LIHTC housing. This analysis found no statistically significant relationship between statewide housing needs indicators and QAP preferences or set-asides. Our data also did not suggest any trends illustrating that states succeeded in using vacancy rate or very low-income preferences to target counties that had the greatest shares of corresponding needs. However, states do appear to have used their QAPs to increase production of new construction, rehabilitation, FmHA, and non-profit sponsored units. Furthermore, QAPs also helped increase

[4] Since we could not find anyone in any of the states who could speak to the 1990 QAPs, we reviewed them twice to minimize omissions and misinterpretations.

[5] Statewide housing needs indicators were obtained from Bogdon, Amy, Joshua Silver, Margery Austin Turner, with Kara Hartnett and Matthew Vandergoot, "National Analysis of Housing Affordability, Adequacy, and Availability: A Framework for Local Housing Strategies," The Urban Institute, November 1993.

[6] Data on the characteristics of LIHTC units was obtained from HUD's Low Income Housing Tax Credit Database which provides information on 700,000 units in over 16,000 projects developed between 1988 and 1998.

production in the early 1990s of projects in Qualified Census Tracts and Difficult Development Areas.

Finally, Section 4 assesses the overall activism of state QAPs in targeting LIHTC production to particular types of households or to particular types of locations, and summarizes changes over the 1990s in these two broad groups of set-asides and preferences. This analysis highlighted wide variation in how actively states used their QAPs to target housing needs. Over the course of the 1990s, QAPs generally shifted toward more place-based priorities, primarily because of federal requirements to provide preferences for targeted improvement areas and Qualified Census Tracts. Finally, states that primarily focused on either people- or place-based priorities at the beginning of the decade tended to make their QAPs more balanced by the end of the decade.

2. CHARACTERISTICS OF QUALIFIED ALLOCATION PLANS

For each category of preferences, this section presents the number and percent of states whose allocation plans explicitly included either point preferences or set-asides in 1990 and in 2001. We discuss the specific preferences most commonly established within each category, as well as the total number of states with preferences in the category as a whole.

Geographic Location

Nearly all of the states we reviewed established preferences that explicitly influenced the geographic distribution of tax credit projects. Geographic preferences favored projects on the basis of whether they were in urban or rural areas, served communities meeting particular population thresholds, or promoted set revitalization plans.

Exhibit 2: Geographic Location Preferences and Set-Asides

Geographic Location Preferences and Set-Asides

	1990		2001	
	number	**percent**	**number**	**percent**
Urban/rural preference	28	60%	37	73%
Urban/rural set-aside	17	36%	27	53%
Community size preference	5	11%	13	25%
Community size set-aside	2	4%	4	8%
Targeted improvement area preference	15	32%	43	84%
Targeted improvement area set-aside	1	2%	1	2%
Total geographic preferences	**34**	**72%**	**49**	**96%**
Total geographic set-asides	**19**	**40%**	**28**	**55%**

**Total number for 1990 = 47 (excludes Alabama, Arkansas, California, and Maine).Total number for 2001 = 51 (all states including Chicago).*

In 2001, approximately three-quarters of the states stipulated preferences for projects based upon whether they were in urban or rural areas. States that had quantifiable scoring schemes for these preferences awarded, on average, up to 8.3 percent of their points for projects that qualified in 1990 and 4.7 percent in 2001. Average set-asides were 20 percent and 10 percent in 1990 and 2001 respectively. Specifically, half of the states gave preferences for FmHA projects or projects that received US Rural Development Section 515 funds, which were necessarily located in rural areas. Another quarter of the states explicitly targeted rural communities, while several states gave preference to projects in urban communities. Rural areas were defined by either state or local governments, and states updated lists of the specific counties to be targeted each year. These preferences changed slightly between 1990 and 2001. In 2001, states were more precise in defining rural areas by using FmHA project definitions or being more explicit about population thresholds. This compared with 1990, when 25 percent of the QAPs used loose, state definitions for rural areas with nearly a quarter of all states specifically using the USRD 515 definition of rural areas. In 1990, 28 states gave preference to projects based on whether they were located in metropolitan or non-metropolitan areas as compared with the 37 states that did so in 2001.

One way of framing metro/non-metro preferences was to specify population characteristics as a way to target particular communities. The number of states that set population thresholds to target counties with certain characteristics nearly doubled from 1990 and 2001 from five to thirteen, respectively. At the county level, several states defined as rural, communities with populations less than 50,000 people or municipalities with populations less than 25,000. In 2001, for example, Wisconsin awarded no extra points to projects that were proposed in the nine most populous counties of the state. Still other allocation agencies divided their states into regions by classifying counties as rural, suburban, and urban, while other states divided regions strictly by geographic bases into North, South, East, and West regions. In 2001, several states used community size to promote equitable distribution of tax credits on a per capita basis.

The most common geographic preference was mandated in 2000 by federal law to favor projects located in targeted improvement areas. By 2001, 43 states awarded preference points to projects that contributed to locally drafted community revitalization plans (particularly those located in HUD-designated qualified census tracts[7]). Other states awarded points to proposals for projects in city-sponsored TIF zones, Public Improvement Districts, regional or local planning areas for which there was a plan approved by a regional planning commission, or in federally-defined areas such as federal empowerment zones/enterprise communities, HUD enterprise zones, main streets, blighted areas, and urban infill areas. States with quantifiable scoring schemes awarded an average of up to 4.3 percent of their points for projects that qualified in 1990 and 3.45 percent in 2001.

While provisions for “improvement areas” were relatively common in 1990, when fifteen states established such preferences, these preferences were generally too vague to be effective, according to several state respondents. In 1990, states typically required only letters of approval from local governments or non-profit organizations to prove that projects contributed

[7] Qualified census tracts are designated by the Secretary of Housing and Urban Development and are defined as areas in which at least 50 percent of the households are below 60 percent of the area’s median income.

to revitalization plans. In general, between 1990 and 2001 states more specifically defined eligible targeted improvement areas. Despite these changes, several respondents indicated that it remained difficult to prove that projects contributed to revitalization plans because of how broadly ‘plans’ could be defined. Predicting how substantially proposals would actually contribute to existing plans was also difficult.

Overall, geographic preferences favored projects in rural areas defined by population thresholds, and QAPs in most of the states awarded points to projects that contributed to revitalization plans. However, through our interviews with state officials, we learned that despite rural preferences, a majority of LIHTC projects were located in urban areas. This is due to a greater share of the population, and an even greater share of renters, residing in urban areas. Targeted improvement area preferences may need to be more narrowly defined and impact indicators may be required to assess how substantially projects contribute to them.

Local Housing Needs

Indicators of local housing needs or market conditions, such as vacancy rates, income levels, and housing construction costs were also factors in scoring LIHTC proposals. Some states established targeting based on housing needs at municipal levels, while others established these targets for smaller, neighborhood levels.

Exhibit 3: Local Housing Needs Preferences and Set-Asides

	1990		2001	
	number	percent	number	percent
Vacancy rate preference	7	15%	8	16%
Vacancy rate set-aside	1	2%	0	0%
Poverty rate preference	25	53%	40	78%
Poverty rate set-aside	3	6%	3	6%
Total local housing needs preferences	**29**	**62%**	**42**	**82%**
Total local housing needs set-asides	**3**	**6%**	**3**	**6%**

**Total number for 1990 = 47 (excludes Alabama, Arkansas, California, and Maine).Total number for 2001 = 51 (all states including Chicago).*

Source: Urban Institute

In 2001, only eight states established preferences for projects proposed in areas with low rental vacancy rates, where tight market conditions made it difficult for low-income households to find affordable units. In states where scoring schemes could be quantified, an average potential maximum of 5.5 percent of total points could be awarded to projects that qualified in 1990 and 8.2 percent in 2001. Wyoming, for example, gave preference to proposals that targeted communities with vacancy rates ranging from 0-13 percent. Other states awarded preference points to projects in census tracts or counties with the "greatest housing needs", sometimes defined as areas with 2-5 percent vacancy rates. Although few states explicitly awarded preference points to projects based on area vacancy rates, respondents from several state allocation agencies explained that vacancy rate estimates were often folded into market studies. These market studies were used to document the need for new housing development.

Several states used community income or poverty rates, most commonly at census tract levels, to target needy communities. 1990 QAPs awarded an average of up to 8 percent of their points to qualifying projects. In 2001, states awarded a potential maximum of 4.9 percent of their points to such projects. Average maximum set-asides were 20 percent and 25 percent in 1990 and 2001 respectively. At the county level, there was a general increase through the 1990s in the number of states that awarded preference points to proposals based on poverty or income statistics, with 25 states doing so in 1990 compared to the 40 states in 2001. Several states used median county income statistics to target specific areas with high concentrations of poverty. For example, several states used HUD standards to provide preferences for projects in 'low income' counties, with median incomes at or below 80 percent of the state's median income. Other states awarded points to projects in counties that had median incomes below state averages or counties in which 10 percent of households had incomes at or below the poverty level. In the early QAPs, states primarily targeted "distressed areas", without defining them. Relative to 1990, stipulations in the 2001 QAPs were much more specific.

At the neighborhood and census tract levels, three quarters of the states made provisions for qualified census tracts. It was common for projects proposed in QCTs to be awarded extra preference points in scoring rounds. In 1990, only half of the QAPs made provisions for projects located in QCTs. Approximately half of the states also gave preferences to projects proposed in "difficult development areas", where much like QCTs, the code also allowed applicants to receive up to 130 percent of eligible bases. Defined by HUD as areas with high construction, land, and utility costs relative to area median income, in both 1990 and 2001 half of the states awarded preference points to projects located in difficult to develop areas.

State preferences based on the characteristics of local housing needs were common, although the number of states giving preference to proposals based on these criteria changed very little though the 1990s. Preferences based on vacancy rates at both neighborhood and county levels were used by approximately one-eighth of the states in both 1990 and 2001. More states began using income or poverty indicators though the 1990s, with most of the state preferences targeting QCTs. Roughly half of the states awarded points to projects proposed in difficult to develop areas, a percentage that did not change substantially between 1990 and 2001.

Financing

QAP preferences also focused on projects' financing characteristics; in both 1990 and 2001, approximately three quarters of the QAPs included preferences for projects that leveraged other government funds. Most commonly, proposals that leveraged additional funds from private sources or public agencies at local, state or federal levels were given preference.

Exhibit 4: Financing Characteristics Preferences and Set-Asides

	1990		2001	
	number	percent	number	percent
Other government funding preferences	37	79%	46	90%
Other government funding set-asides	14	30%	15	29%
Equity from developer preferences	2	4%	13	25%
Equity from developer set-asides	0	0%	0	0%
Total financing characteristics preferences	**37**	**79%**	**46**	**90%**
Total financing characteristics set-asides	**14**	**30%**	**15**	**29%**

**Total number for 1990 = 47 (excludes Alabama, Arkansas, California, and Maine).Total number for 2001 = 51 (all states including Chicago).*

Source: Urban Institute

In 2001, 46 states gave preference to projects that secured matching funds, such as grants, from sources other than the LIHTC program. Where preferences schemes could be quantified, on average, developers could earn up to 6.3 percent of total points for projects that qualified in 1990 and 7.1 percent in 2001. Average set-asides were 18.2 percent and 10.2 percent in 1990 and 2001 respectively. Notably, fourteen QAPs specifically gave preference to projects that received USDA 515 Rural Housing Service Grants, which served the dual purpose of favoring projects in rural areas as discussed earlier. Other federal programs that several state QAPs gave preferences to included HOPE VI, HOME, Section 8, CDBG, and Federal Home Loan Bank funds. Other states were very general, stating that projects would receive points if local governments agreed to forgive development fees, grant tax abatements, or provide local grants. Most 1990 QAPs were general in their stated preferences for local government funding. Several, for example, awarded points to proposals that received financing from any source at federal, state, and local levels. The 2001 QAPs were equally inclusive but cited specific examples of eligible programs.

Preferences for projects based on the amount of equity that developers brought to the table were far less common than preference for leveraged government funds. QAPs cited specific preferences for developer equity in only thirteen states in 2001 and only two in 1990. In 2001, Alaska considered developer equity to be matching funds and awarded extra points. Other states awarded points if owner equity exceeded 10 percent of total development costs, or if the developer committed a percentage of allowable developer fees to project development. Massachusetts's 1990 QAP stated that the developer had to commit in cash at least 2.5 percent of the project's total development cost to be eligible for credits.

Resident Characteristics

A vast majority of the states gave preferences for projects proposing to target specific types of residents. Targeted groups included the mentally or physically disabled, elderly, homeless, minorities, large families, and either households on waiting lists for, or current residents of, public housing developments. Specifying preferences for these types of residents was a means of encouraging developers to consider and design their projects to help meet housing needs for these groups. In most cases, states awarded preference points in proportion to the percentage of units set aside for the user groups in order to encourage mixed developments.

The broadest category of targeted residents was "special needs." The number of states giving preference for projects that targeted "special needs" residents remained relatively unchanged through the 1990s with nearly all the QAPs specifying preferences in both 1990 and 2001. Most states defined special needs tenants as persons with mental illness or retardation, HIV/AIDS patients, persons with developmental and physical disabilities, or persons with drug or alcohol addictions. Where preferences were quantifiable, states awarded an average of up to 7.8 percent of their points for projects that qualified for special needs preferences in 1990 and up to 5.2 percent in 2001.

Nearly all of the QAPs also gave preference to projects targeting "very low income" residents. The LIHTC program requires that at least 20 percent of the units in a proposed development be affordable to households with incomes below 50 percent of Area Median Income (AMI) or 40 percent of the units be affordable to households at 60 percent AMI. Several states required projects to serve 'lowest income' households, defined as those at or below 50 percent AMI, or award extra points based upon the percentage of units that were set-aside in excess of the mandated minimums. In 2001, approximately one-fourth of the states designed point schemes that awarded points to projects targeting households below 50 percent AMI and/or exceeding the minimum set aside of units. Over 25 percent of the states also gave preference points to projects serving households at 40 percent, 30 percent, to as low as 20 percent AMI. In 1990 slightly fewer states gave preference to projects serving "lowest income" tenants. States with measurable scoring schemes for these preferences awarded up to of 14 percent of their points for projects that qualified in 1990 and up to 13 percent in 2001.

Exhibit 5: Resident Characteristics Preferences and Set-Asides

Resident Characteristics Preferences and Set-Asides

	1990		2001	
	number	percent	number	percent
Special needs preferences	40	85%	47	92%
Special needs set-asides	4	9%	2	4%
Very-low income preferences	35	74%	45	88%
Very-low income set-asides	1	2%	1	2%
Public housing preferences	45	96%	44	86%
Public housing set-asides	0	0%	1	2%
Large family preferences	38	81%	44	86%
Large family set-asides	1	2%	0	0%
Elderly preferences	33	70%	41	80%
Elderly set-asides	3	6%	7	14%
Homeless preferences	39	83%	36	71%
Homeless set-asides	2	4%	2	4%
Minority preferences	4	9%	2	4%
Minority set-asides	0	0%	0	0%
Total resident characteristics preferences	**46**	**98%**	**50**	**98%**
Total resident characteristics set-asides	**7**	**15%**	**14**	**27%**

**Total number for 1990 = 47 (excludes Alabama, Arkansas, California, and Maine). Total number for 2001 = 51 (all states including Chicago).*

Source: Urban Institute

In both 1990 and 2000, virtually all of state QAPs awarded preference points to projects serving households on public housing agency (PHA) waiting lists or former public housing residents. Developers could receive preference points if they committed in writing to give priority to households waiting for either public housing or Section 8 housing vouchers. This preference is common, in part, because the Omnibus Reconciliation Act of 1989 (Public Law 101-239) mandated that the criterion be used in the final selection of LIHTC recipients. In 2001, four allocation agencies went further and established preferences for projects that served existing PHA residents. Chicago and Georgia awarded points to proposals that set aside percentages of units to public housing tenants while Kentucky and Tennessee gave preference to projects sponsored and/or assisted by PHAs in selecting residents.

More than 80 percent of the states awarded preference points in both 1990 and 2001 to developments that committed a percentage of units to serve “households with children” or “large families.” States awarded up to 9.2 percent of their preference points for projects that qualified in 1990 and up to 4.7 percent in 2001. In both years, states defined large-family units as units with three or more bedrooms. Interestingly, this preference was federally mandated at the end of year 2000 but because most states already had it incorporated into their QAPs, the new requirement had little impact.

Several states also gave preference to projects serving elderly residents, people transitioning out of homelessness, and minorities. Approximately three quarters of the states gave preference in both 1990 and 2001 to projects serving residents older than 50, 55, or 62. States that had quantifiable scoring schemes for these preferences awarded an average maximum of 6.3 percent of their points for projects that qualified in 1990 and 6.0 percent in 2001. Transitional housing for the homeless, such as single room occupancy (SRO) units, was targeted in three quarters of the states in both 1990 and 2001. Generally, states awarded points to proposals based on the percentage of units set aside to meet the needs of this resident group. Again, where we could measure the maximum number of points that states awarded for homeless preferences, states awarded up to 7 percent of all points for this preference in 1990 and up to 4.5 percent in 2001.

In 1990, four states gave preference to projects serving minority residents which contrasted with 2001 QAPs in which we did not find any states explicitly proposing to target minority residents. In 1990, for example, preferences were given to projects with marketing plans designed to target minority residents, projects developed in census tracts where more than 50 percent of the population consisted of minority residents, and projects producing racially integrated housing outside of areas with high concentrations of low-income residents.

In both 1990 and 2001, most states gave preference to projects based on the types of residents that developers proposed to target. While some of these preferences (such as targeting minority residents) slowly dissolved over the years, other preferences for public housing residents remained constant. Preferences for residents with special needs such as those with ‘very low’ incomes, homeless, households on PHA waiting lists, large families, and elderly were all extremely common.

Project Activities and Types

Several states established preferences based on the type of development being proposed. The most common such preference was support for existing affordable housing projects that were ‘at-risk’ of losing their rent restrictions and increasing to market rates.

In 2001, half of the states gave preference to projects that proposed acquisition and/or rehabilitation of 'at-risk' properties. States defined at-risk projects differently. Some states stipulated that rent-assisted projects eligible for mortgage pre-payments, threatened with foreclosure or default, or that faced expiring rental assistance could be considered 'at risk.' HUD's Section 8 Housing Assistance Payment Program was cited repeatedly as an example. Another common example was USDA Section 515 developments for which prepayment was being filed. As part of the LIHTC requirements, proposed projects had to consist of substantial rehabilitation work in addition to the cost of acquiring the property. Developers who proposed to merely acquire a property without any improvements could not qualify for tax credits. States awarded an average of up to 8.7 percent of their preference points for projects that qualified in 1990 and 4.5 percent in 2001.

Exhibit 6: Project Activities and Types Preferences and Set-Asides

Project Activities and Types Preferences and Set-Asides

	1990		2001	
	number	**percent**	**number**	**percent**
At-risk preferences	28	60%	27	53%
At-risk set-asides	2	4%	9	18%
New construction preferences	7	15%	5	10%
New construction set-asides	1	2%	1	2%
Rehabilitatoin preferences	12	26%	23	45%
Rehabilitation set-asides	1	2%	4	8%
Mixed-use preferences	0	0%	3	6%
Mixed-use set-asides	0	0%	0	0%
Total activities and types preferences	**33**	**70%**	**37**	**73%**
Total activities and types set-asides	**3**	**6%**	**12**	**24%**

**Total number for 1990 = 47 (excludes Alabama, Arkansas, California, and Maine).Total number for 2001 = 51 (all states including Chicago).*

Georgia, Iowa, and Louisiana were among the seven states that gave preference in 1990 to projects proposing new construction over rehabilitation of the existing housing stock. The number of states giving preference to rehabilitation projects doubled during the 1990s, with half of the states giving preference to rehabilitation projects in 2001 compared with a quarter of the states that did so in 1990. Most of the change came as a result of mandated preferences for rehabilitation projects contributing to community revitalization projects, required of QAPs in 2001. Preliminary interviews with state allocation agencies indicated that the majority of proposed LIHTC developments consisted of new construction, and that awarding points to rehab projects was, in some cases, a means of trying to pressure developers to rehabilitate housing in blighted areas.

We also looked for QAP preferences for mixed-use developments and multifamily buildings. Neither of these preferences were significant, with only Nevada, Oregon and Utah proposing to award preference to developments that proposed to combine residential and commercial space. While some states recently began awarding preferences to projects proposing single-family housing developments, none of the states explicitly gave preference to multi-family buildings.

Overall, states awarded preferences for projects that proposed to redevelop at-risk properties or that proposed rehabilitation of existing buildings. Preferences for at-risk properties were meant to preserve existing housing and to stabilize (to the degree possible) the affordable housing stock. Preferences for general rehabilitation were designed to counteract the trend for most developments being proposed as new construction. Preferences or set-asides for mixed-use and multi-family buildings were minimal and non-existent, respectively.

Building Characteristics

Several QAPs stipulated preferences for buildings exhibiting particular size characteristics. Two sets of criteria were specified; one was based on unit size while the other was based on the number of units. States used these preferences to be more specific in stipulating the characteristics of new affordable housing.

Exhibit 7: Building Characteristics Preferences and Set-Asides

	1990		2001	
	number	percent	number	percent
Size of units preferences	29	62%	30	59%
Size of units set-asides	0	0%	0	0%
Number of units preferences	19	40%	27	53%
Number of units set-asides	2	4%	7	14%
Total building characteristics preferences	**34**	72%	**39**	76%
Total building characteristics set-asides	**2**	4%	**7**	14%

**Total number for 1990 = 47 (excludes Alabama, Arkansas, California, and Maine).Total number for 2001 = 51 (all states including Chicago).*

Source: Urban Institute

States used two methods, square footage standards and number of bedrooms, to encourage the development of units of certain sizes. In 2001, a quarter of the states stipulated square footage per bedroom standards. Another quarter of the states awarded points to projects with a minimum number of three-bedroom units that could serve large families. This compared with 1990, when half of the states gave preference to projects based on the number of three-bedroom units in the development. Still, other states took more broad-based approaches and awarded points if developers proposed unit sizes that, based on market research, were consistent with local housing needs. On average, QAPs awarded up to 11.6 percent of their preference points for projects that qualified in 1990 and 4.3 percent in 2001. From 1990 to 2001, states generally moved from vague preferences based on the number of bedrooms, to more precise square footage per bedroom ratios.

Several states explicitly set limitations on total project sizes by either restricting the total number of units or awarding preference points based on number of units. In 2001, none of the states awarded preferences for projects with more than 150 units. All projects were either penalized if they went over this threshold, or received progressively fewer points as they approached it. Most states, however, gave preference to projects that were below 50 units. Particular examples of promoting projects based on total units were to award more points to rehabilitation projects or to allow higher developer fees if developments were small. In 1990, states were vague in setting their size preferences, and stated that points would be awarded if the total number of units was consistent with local housing needs. In general, states favored projects with fewer units. States awarded up to of 7.7 percent of their points for projects that qualified for these preferences in 1990 and 4.5 percent in 2001.

Through the 1990s, states became more precise in specifying preferred building characteristics. Several states used precise square footage-to-bedroom ratios in an attempt to promote certain unit sizes, which were determined by community needs. For example, some states may have sought to target large-family units while others sought to provide small-unit housing to people transitioning out of homelessness. The number of preference points that most states awarded tended to be inversely proportional to the size of the development, in order to promote smaller, more dispersed affordable housing developments that did not concentrate low-income households.

Sponsorship and Costs

Several states gave preferences to projects with specific sponsorship and cost characteristics. More specifically, projects were awarded points if they were developed by non-profit, minority or women-owned businesses. While all tax credit allocation agencies were required to set aside ten percent of their credits to projects sponsored by non-profit developers, many states outlined additional criteria for ‘specialized’ non-profits based on activities or locations of operation. In addition, several states capped developer, builder, and legal fees and regulated tax credit syndication.

Exhibit 8: Sponsorship Characteristics Preferences and Set-Asides

	1990		2001	
	number	percent	number	percent
Non-profit type preferences	6	13%	12	24%
Non-profit type set-asides	5	11%	9	18%
Non-profit region preferences	27	57%	27	53%
Non-profit region set-asides	16	34%	24	47%
Minority/women business preferences	15	32%	15	29%
Minorty/women business set-asides	0	0%	0	0%
Total sponsorship characteristics preferences	**32**	68%	**39**	76%
Total sponsorship characteristics set-asides	**18**	38%	**27**	53%

**Total number for 1990 = 47 (excludes Alabama, Arkansas, California, and Maine).Total number for 2001 = 51 (all states including Chicago).*

Source: Urban Institute

In 2001, half of the states made provisions for specific types of non-profits in their QAPs. These consisted of local governments, public development agencies such as public housing authorities, or community-based non-profits such as Community Housing Development Corporations (CHDOs). This compared with 1990, when only a quarter of the states made provisions for projects sponsored by PHAs and local governments. While several states specified the types of non-profits they sought to target, very few QAPs awarded preference points on this basis. Mostly, PHAs and CHDOs were used as examples of the types of non-profit developers that the states sought to target.

Several states gave preference to non-profits based on their location. In 2001, nearly half of the QAPs specified that non-profits had to be locally-based in order to qualify for non-profit set-asides. Some states established broader requirements and specified that non-profits simply had to be licensed to operate in-state or have in-state bases of operations. Other states required that at least 50 percent of the board of directors be comprised of state residents, the organization be operating in-state for at least twelve months before applying for credits, or that the organizations be based in the communities in which developments were proposed. In 1990, nearly half or the states broadly specified that non-profits had to be locally-based while only a few required that non-profits be based in-state. Several state respondents indicated that requirements became more stringent to avoid problems with developers who, for example, formed non-profits in a relative's name to qualify for non-profit set-asides. QAPs awarded an average maximum of 7.3 percent of their preference points for projects that qualified in 1990 and 3.0 percent in 2001. As with several other of the preferences that we observed, regional preferences for non-profits evolved and became more specific.

Between 1990 and 2001, the number of states that gave preferences to development companies owned by minorities or women remained constant, with fifteen states making provisions in both 1990 and 2001. Several states specified that in order to qualify, minorities and women would have to be general partners, owners, or managing members of the business with at least 51 percent controlling interest. One state targeted these businesses by awarding points if developers contracted out fifteen percent of construction costs to contractors, subcontractors, and material suppliers that were minority women-owned businesses. States with minority or women-owned business preferences awarded up to 7.0 percent of their preference points for projects that qualified in 1990 and 3.0 percent in 2001.

Exhibit 9: Cost Characteristics Preferences

	1990		2001	
	number	**percent**	**number**	**percent**
Total cost restrictions	6	13%	19	37%
Unit cost restrictions	2	4%	32	63%
Fee restrictions	22	47%	49	96%
Builders and sponsors profit and risk allowance restrictions	8	17%	46	90%
Syndication restrictions	4	9%	20	39%
Legal fee restrictions	4	9%	7	14%
Total cost characteristics preferences	**28**	**60%**	**49**	**96%**

**Total number for 1990 = 47 (excludes Alabama, Arkansas, California, and Maine).Total number for 2001 = 51 (all states including Chicago).*

Source: Urban Institute

Several states also restricted total development costs. Wyoming was the only state that explicitly penalized projects if total development costs crossed a certain threshold. If they did, the allocation agency deducted progressively more points as development costs rose. While virtually no states specifically limited total construction costs, many restricted the amount of credits any one project could receive. Several allocation agency officials noted that capping the amount of tax credits a project could receive effectively limited total development costs. This was due to the fact that developers typically designed 100 percent of their project units for low-income use. Since tax credits could only be used to construct units set aside for low-income use, limiting the total subsidy effectively limited the total development costs.

In 2001, states commonly restricted development costs on per-unit bases. Nearly half of the states did so using HUD Section 221(d)(3)-NP cost standards. Other states specified their own per-unit or per-bedroom cost standards. Some states limited subsidies on per-bedroom bases while others used sliding scales to award points to projects proposing the most efficient use of tax credits, measured by per-unit costs.[8] This preference became less prevalent during the latter part of the 1990s and many state officials indicated that they de-emphasized this criterion because it encouraged builders to develop lower-quality buildings, resulting in higher maintenance costs. Overall, states became better at designing and/or employing standards that could be measured to assure quality construction.

Several states placed caps on fees and syndication expenses. In 2001 most of the states restricted developer fees to 20 percent or less of total development costs, while our review of 1990 QAPs revealed that roughly half the states explicitly limited fees. Nearly all the states specifically limited builder and sponsors profit and risk allowance (BSPRA) in 2001, compared with only eight states in 1990. Very few QAPs specified limitations on legal fees. Instead, several state allocation representatives noted that they determined the reasonableness of proposed legal fees through internal review processes. QAPs also awarded preference points based on whether developers received ratios of equity on tax credit dollars that surpassed state-established minimums. Two states simply set minimum equity ratios that developers had to meet for their projects to receive credits.

Exhibit 10: Affordability Preferences

	1990		2001	
	number	**percent**	**number**	**percent**
eligibility restrictions	41	87%	45	88%

**Total number for 1990 = 47 (excludes Alabama, Arkansas, California, and Maine).Total number for 2001 = 51 (all states including Chicago).*

Source: Urban Institute

Forty-one states required, or gave preference to, projects proposing to extend the periods for which units were available for low-income occupancy beyond the federally required, 30-year minimums. Several states went beyond this by either awarding points or requiring projects to extend affordability periods beyond these requirements. In the most extreme cases—such as Massachusetts, Michigan, and Vermont—projects were given preference if they

[8] A common exception to this rule was for developments that were proposed in difficult development areas or qualified census tracts.

pledged to maintain the affordability restrictions in perpetuity. Other states such as Colorado, Florida, Hawaii, Indiana, New Mexico, Utah, Virginia, and Wyoming gave preference to projects that proposed extending affordability periods up to 50, 55, or 60 years. Iowa, Maryland, Nebraska, Oklahoma, South Dakota, Texas, and West Virginia awarded preference point to projects if they extended their affordability periods to 40 or 45 years. Typically states awarded points in one, five, or ten year increments up to these maximums. For example, Nevada awarded ten points for every five years the developer committed to maintain affordability restrictions on the units. Extending affordability periods was a common practice in both 1990 and 2001 when nearly 90 percent of state QAPs made provisions for this.

Conclusion

Of all the QAP provisions considered, the most widely used preferences targeted projects that were in rural areas, contributed to community revitalization plans, leveraged funding from other government programs, served special needs residents, or extended affordability periods beyond minimum requirements. All of the states restricted developer and/or builder fees, and several restricted the total tax credits any single project could receive. Other common state preferences were for projects that acquired and rehabilitated at-risk properties, had fewer and larger units, or were sponsored by non-profit organizations that were locally-based. In addition, this review of state QAPs reveals three broad conclusions about the evolution of tax credit allocation plans over the course of the 1990s.

First, the major difference observed between QAPs in 1990 and 2001 was the precision with which allocation agencies defined their criteria as the LIHTC program matured and states learned lessons from previous allocation rounds. This generally reduced ambiguities in allocation plan language, and resulted in more concretely phrased requirements. Applicants benefited from better understanding what was required to fulfill preference criteria and state agencies were better equipped to assure that preferences were awarded in the spirit in which they were intended.

In addition, we observed a strong correlation between the complexity of state QAPs and the amount of tax credits the states had to allocate. For instance, while QAPs in all the states generally specified few set-asides to begin with, this was especially true in less-populous states with small allocations. For example, states such as Rhode Island that could only afford to fund a handful of LIHTC projects each year did not attempt to split their already small allocations into yet smaller sub-allocations. While there is a correlation between complexity and allocation size, the relationship was by no means steadfast. New York, for example, had a fairly simple QAP which changed very little through the 1990s despite the fact that it ranked 5th in the number of LIHTC units authorized from 1990 to 1999.[9]

Finally, QAPs tended to change slowly over time. Through discussions with tax credit coordinators, we learned that QAPs did not change drastically with changes in administrations. In general, revising QAP preferences and set-asides was an additive process in which most changes between 1990 and 2001 could be characterized as the addition of new preferences rather than the removal of 'old' ones. This is partly the result of new requirements being introduced at the federal level, which required changes in state QAPs. For example, one of the biggest changes between 1990 and 2001 was the number of states giving preference to projects that contributed to targeted improvement plans.

[9] Danter Company, Low Income Tax Credit Units Authorized by State, downloaded from http://www.danter.com/taxcredit/tcalloc.htm, January 11, 2001.

3. LOW-INCOME HOUSING NEEDS AND LIHTC PRODUCTION

It seems likely that QAPs respond to variations across states in policies and priorities for the LIHTC program, variations in housing conditions and needs, and patterns of affordable housing production. This section explores possible linkages between state allocation policies and statewide measures of housing needs on the one hand, and the characteristics of LIHTC units actually built on the other. More specifically, we used 1990 census data to assess the extent to which specific preferences or set-asides are associated with corresponding indicators of housing needs. And we compared the characteristics of LIHTC units brought into service between 1988 and 1998 to assess the extent to which specific preferences or set-asides have influenced the characteristics of LIHTC housing.

Relating Measures of Housing Need to Qualified Allocation Plans

We begin by analyzing potential relationships between measures of state housing needs and Qualified Allocation Plan preferences and set-asides that could potentially target these needs. The goal of this analysis was to better understand the degree to which state preferences and set-asides are needs-driven. Statewide indicators of housing conditions and needs were taken from tabulations of 1990 Census data prepared in the Urban Institute's 1994 report, "National Analysis of Housing Affordability, Adequacy, and Availability: A Framework for Local Housing Strategies."[10] We compared the mean values of housing need measures for states that had corresponding preferences and set-asides, with mean values for states that did not have them. Then, for states that assigned explicit numerical values to their preferences or set-asides, we correlated need measures with these values to determine whether the magnitude of the preference or set-aside was related to needs. We searched for linkages between the 1990 housing need data and both the 1990 and 2001 QAP preferences and set-asides, scrutinizing the 1990 relationships more closely.[11] We analyzed relationships between the needs indicators and preference categories in Exhibit 11.

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[10] Bogdon, Amy, Joshua Silver, Margery Austin Turner, with Kara Hartnett and Matthew Vandergoot, "National Analysis of Housing Affordability, Adequacy, and Availability: A Framework for Local Housing Strategies," The Urban Institute, November 1993.

[11] To verify the compatibility of the 1994 housing need dataset with both the 1990 and 2001 QAP data, we first ran a correlation analysis between population from the 1994 dataset with the total tax credit allocations for both years from the QAP dataset. As expected of allocations that are population-based, we found a nearly perfect correlation between population state allocations. This verified on a basic level that the two datasets could be compared despite the fact that the years from which the data was originated were not the same.

Exhibit 11: Needs Indicators and QAPs

	Housing Needs Indicator – 1990 Census		1990 & 2001 QAP Preferences and Set-asides
1.	Vacancy rates for rental units affordable to those with income below 50% HAMFI	&	Vacancy rate
2.	Vacancy rates for rental units with 2 or more bedrooms affordable to those with incomes below 50% HAMFI	&	Vacancy rate
3.	Share of households below 50% HAMFI	&	Very low-income targeting
4.	Housing affordability mismatch – rental units/renter households for <50% HAMFI	&	Very low-income targeting
5.	Percent of elderly households	&	Elderly
6.	Percent of large family households	&	Large family
7.	Percent of large family households	&	Unit size
8.	Percent of MSA or state population in concentrated poverty (in tracts with a poverty rate of more than 40%)	&	Qualified Census Tract

We found no significant relationships between any of these needs indicators and the corresponding preferences and set-asides, for either 1990 or 2000. Mean values of need indicators were no different for states with corresponding preferences or set-asides than for those without, and there were no statistically significant correlations between needs indicators and the value of state preferences or set-asides.

However, we cannot conclude that QAPs were unrelated to state housing conditions and needs. Several state housing finance officials stated in phone interviews that their agencies either carried out market studies, or required them of prospective LIHTC developers as a condition of being awarded allocations. We can only conclude that the state-wide measures of housing need used here are too highly aggregated to reflect the within-state variations that may have motivated the creation of particular preferences and set-asides. To counteract this shortfall, we acquired county-level data on vacancy rates and renter poverty, and compared it with LIHTC production data and QAP preferences. We discuss our findings from this analysis later in this section.

Relating Qualified Allocation Plans with LIHTC Units Produced

Next we assessed the impacts that QAP preferences and set-asides had upon the characteristics of LIHTC units produced. The potential ability to measure the outcome of QAP policies by the number of units constructed could be a powerful indication of the potential strength of QAPs as policy tools. We viewed this portion of the analysis as particularly important and found some modest relationships between preferences and set-asides and the types of units produced.

We utilized the Department of Housing and Urban Development's LIHTC database to analyze the relationship between QAP preferences and the characteristics of LIHTC units developed. This database provides information on the characteristics of over 16,500 projects, with 700,000 low-income housing units, developed between 1988 and 1998.[12] From the LIHTC database, we converted raw housing unit production figures for each relevant characteristic into percentages of total units developed for each state. We combined production data from 1987-1992 and 1993-1998, and compared it with QAP preferences and set-asides from 1990 and 2001, respectively. This allowed us to look at change between the beginning and end of the decade, and relate 1990 preferences and set-asides to the types of units being produced at the time. By comparison, the 2001 QAP fell after the 1993-98 time period. As a result, we could only compare these QAPs with what had already been produced. Again, since the QAPs generally appeared to change very slowly over time, we thought it reasonable to assume that the 2001 QAPs were good proxies for what preferences and set-asides were in place in the late 1990s. By comparing the early and late periods, we hoped to observe production trends that, over time, became more responsive to QAP policies. In both cases, we tried to explain the direction of the relationships between unit production and QAP preferences. We considered whether QAPs appeared to act as 'wedges' or 'walls'. That is, did QAPs succeed in leveraging shifts in production or did state housing finance agencies draft policies to protect underserved households or areas?

Our methodology for analyzing outcomes was similar to the needs analysis discussed earlier. First, we compared the mean values for characteristics of LIHTC units produced between 1989 and 1992 in states that did, and did not have corresponding preferences and set-asides in 1990. We carried out similar comparisons between 2001 preferences and set-asides

[12] As with the housing needs characteristics data, we performed a basic test of the compatibility of the QAP dataset and the LIHTC database. We correlated the total number of housing units developed in each state with state-level tax credit allocation figures for 2001. As we expected, there was a very strong correlation between allocation values and the total number of units each state developed. This verified, on a very basic level, that the data sets were compatible and represented similar universes.

and the mean characteristics of units produced between 1993 and1998. For states with explicit preference-award schemes and set-asides, we also correlated the percentages of units developed with preference and set-aside weights.[13]

The LIHTC unit characteristics that we analyzed included unit size, construction type, non-profit sponsorship, urban/rural location, and HUD-designated locations. Specifically, we compared the LIHTC housing characteristics and QAP elements summarized in Exhibit 12.

Exhibit 12: LIHTC Unit Characteristics and QAPs

Characteristic of LIHTC housing developed between 1988-1998	QAP Preference/Set-Aside
Unit Size	
% units with 3 bedrooms	Large family
% of units with 4 bedrooms	Large family
% units with 3 bedrooms	Size of units
% of units with 4 bedrooms	Size of units
Construction Type	
% new construction	New construction
% acquisition/rehab	Rehabilitation
Non-Profit Sponsorship	
% projects with Non-profit sponsor	Specialized non-profit
Urban/Rural Locations	
% in Metro Area	Rural-Only
% projects with FmHA Financing	FmHA
HUD-designated Locations	
% in Qualified Census Tracts	Qualified Census Tract
% in Difficult to Develop Areas	Difficult to Develop Area

Unit Size. We found virtually no relationship between large family/large unit preferences and the percentage of 3- and 4-bedroom units developed. In 1990, we found an extremely tenuous, but positive relationship between states that developed 3-bedroom units and those that had preferences for large units. In 2001, a weak negative relationship was observed between

[13] Because data were available for the universe of states, conventional tests of statistical significance (which focus on sampling error) were not applicable. Therefore, we considered findings to be “significant” if their probability of occurring by chance was below 20 percent.

states with large family preferences and the number of 3-bedroom units they developed. This may indicate that states used preferences as walls, and states tried to react to low levels of large-unit production by drafting preferences that encouraged large-family unit production.

There were no cases to compare production outcomes between states that did, and did not have set-asides. The handful of states that had such set-asides lacked corresponding production data for large units. As a result, we could not analyze mean shares of large units for this group. Similarly, we observed no correlation between the weight of large-family and unit-size preferences/set-asides, and the share of 3- and 4-bedroom units developed. For the few states that did have large-family and unit size set-asides, we had no corresponding production data by which to measure shares of large units developed. Therefore our analysis of correlations between set-aside weight and outcomes is inconclusive.

Construction Type. In both 1990 and 2001, states with preferences for new construction had lower levels of new construction among LIHTC units (see Exhibit 13). For instance, for states with new construction preferences in 1990, the share of LIHTC units that were newly constructed between 1987 and 1992 was 13 points lower than for states with no preferences. This pattern also carried over into more recent years, with the share of new units produced between 1993 and 1998 10 points lower for states with new construction preferences in 2001. Possibly, states used these preferences as 'wedges' to offset industry biases for rehabilitation projects and leverage more new construction projects. It is difficult to comment on the success of the preferences in steering developers toward new construction since there was such a small shift in outcomes between the two time periods. This may, in fact, further support the theory that new construction preferences helped maintain a steady flow of these projects in states where they would have otherwise dried up. We found no relationship between the weight of new construction preferences and the share of new construction units actually developed.

Since there were only two states with set-asides for new construction projects in 1990, we could draw no conclusions about the impact of this policy device. When we had more cases of new-construction set-asides in 2001, we observed no correlation between the weight of the set-aside and state shares of new construction units developed.

In both 1990 and 2001, states with preferences for rehabilitation projects tended to develop smaller shares of rehabilitation units (see Exhibit 14). In 1990, it was possible that states attempted to use the preferences as wedges to increase shares of these units. This could have been a response to market forces in states where developers primarily constructed new LIHTC units from the ground up. If this was the case, then the preferences appear to have been moderately successful. Between 1990 and 2001, states with rehab preferences increased their shares of rehab production, narrowing the gap from a 15 point difference to a 9 point difference between the share of rehab units developed in states with and without rehab preferences. No conclusions could be drawn about the relationship between states that adopted rehab-based set-asides in 1990, when only one state had such a set-aside.

Exhibit 13: QAP Preferences and LIHTC New Construction

New Construction: The Average State-level Share of 'New Construction' Units Developed, by Absence/Presence of QAP Preference, by Year

	1987-1992 Mean		1993-1998 Mean	
	No Preference in 1990	*Preference in 1990*	*No Preference in 2001*	*Preference in 2001*
New construction preference and % of units developed that were new construction	65%	52%	68%	58%

Note: Means given represent the average percentage 'new construction' units developed during the period.

Source: Urban Institute

There did not appear to be any correlation between the weight of a state's preferences or set-asides for rehab projects and the share of rehab units developed. However, there were only two states that had rehabilitation set-asides in 1990, so no firm conclusions can be drawn about that year in particular.

Exhibit 14: QAP Preferences and LIHTC Rehabilitation

Rehabilitation: The Average State-level Share of 'Acquisition/Rehabilitation' Units Developed, by Absence/Presence of QAP Preference, by Year

	1987-1992 Mean		1993-1998 Mean	
	No Preference in 1990	*Preference in 1990*	*No Preference in 2001*	*Preference in 2001*
Rehabilitation preference and % of units developed that were Acquisition/rehabilitation	41%	26%	37%	28%

Note: Means given represent the average percentage 'acquisition/rehabilitation' units developed during the period.
Source: Urban Institute

Non-Profit Sponsorship. Several states gave preference to 'specialized' non-profits, which we define as specific types of non-profits (such as CHDOs), place-based non-profits, or non-profits that focused their efforts on specific activities. These specialized non-profit preferences and set-asides go beyond the basic federal requirements that favor non-profit developers. We assumed that states that went beyond the minimum requirements were more serious about targeting non-profit organizations, and would therefore be more likely to favor non-profits in general.

In 1990, there appeared to be an inverse relationship between preferences for specialized non-profits and the share of units produced by non-profits (see Exhibit 15). From 1987 to 1993, the states that had such preferences in their 1990 QAPs developed 9 percent fewer non-profit units. Thus, it appears that the preferences were used as 'walls' to protect the share of projects developed by non-profits. By 2001, this relationship had dissolved, with no clear relationship between non-profit preferences and the non-profit share of production. It appears that the non-profit share of production rose in the states with preferences to the same level as in other states. Given the dramatic growth in the size and capacity of the non-profit housing sector during the 1990s, it is impossible to determine whether the QAP preferences had a role in this change. We found no relationship between non-profit set-asides and the percentages of non-profit units developed.

Exhibit 15: QAP Preferences and Non-Profit Production

Non-profit Sponsorship: The Average State-level Share of Units Developed by Non-profits, by Absence/Presence of QAP Preference, by Year

	1987-1992 Mean		**1993-1998 Mean**	
	No Preference in 1990	*Preference in 1990*	*No Preference in 2001*	*Preference in 2001*
Non-profit sponsorship preference and % of units developed that were developed by non-profits	24%	15%	25%	28%

Note: Means given represent the average percentage of units developed by non-profits during the period.
Source: Urban Institute

We also found no apparent correlation between the weight of non-profit preferences and the share of units developed by non-profits. There was, however, a very strong correlation between the weight of specialized non-profit set-asides in 1990 and the share of all units developed by these entities from 1987 to 1992 (see Exhibit 16). The more heavily weighted state set-asides were, the greater the share of non-profit units developed. This graduated relationship implies that stronger policy commitments such as heavily weighted set-asides were needed to bring non-profits to the table and that preferences were ineffective. By 2001, there did not appear to be any correlation between QAP set-asides and the number of units developed between 1993 and 1998. This may imply that states with non-profit set-asides used their preferences as 'walls' to shield the sector in the early 1990s from for-profit competition until non-profits became more competitive by the late 1990s.

Exhibit 16: QAP Set-Aside Levels and Non-Profit Production

Non-profit Sponsorship: Correlation Between Weight of Non-profit Set-Aside and Share of Units Developed by Non-Profits

Characteristic of LIHTC housing developed	QAP Preference	Pearson's Correlation Coefficient
% of units developed that were developed by non-profits (1987-1992)	Specialized non-profit (1990)	.526
% of units developed that were developed by non-profits (1993-1998)	Specialized non-profit (2001)	.029

Source: Urban Institute

Urban/Rural Location. The prevalence of state preferences for projects that leveraged FmHA funds declined substantially during the 1990s. In 1990, more than half the states had explicit preferences for FmHA projects, compared with 2001 when only about one third of the states did so. Indeed, in 1990 states with these preferences appeared to succeed in utilizing FmHA preferences as wedges to develop greater shares of these units (see Exhibit 17). However, the strength of the relationship between preferences and outcomes did not continue, and by 2001 QAP preferences only weakly correlated with the share of FmHA-sponsored units. However, 2001 QAP set-asides did appear to have an effect upon levels of production so that states with FmHA set-asides tended to develop more of these projects. This contrasted with 1990 when a very weak relationship appeared to exist between FmHA set-asides and the shares of units developed.

Exhibit 17: QAP Preference and Set-Asides and FmHA Housing Units

FmHA Funding: The Average State-level Share of Units Developed with FmHA funds, by Absence/Presence of QAP Preferences and Set-Asides, by Year

	1987-1992 Mean		**1993-1998 Mean**	
	No Preference/ Set-aside in 1990	*Preference/ Set-aside in 1990*	*No Preference/ Set-aside in 2001*	*Preference/ Set-aside in 2001*
FmHA preference and % of units developed with FmHA funds	24%	33%	12%	16%
FmHA set-aside and % of units developed with FmHA funds	27%	33%	11%	19%

Note: Means given represent the average percentage of units developed by non-profits during the period.
Source: Urban Institute

There did not appear to be any correlation between the weight of the 1990 and 2001 preferences and shares of FmHA units developed. However, we observed a relatively strong correlation between the value of set-asides for FmHA projects in 2001, and state shares of FmHA-financed LIHTC units produced (see Exhibit 18). The relationship was similarly positive in 1990, although the significance of the relationship was much weaker. The weight of FmHA set-asides, therefore, appeared to be relatively important in determining the share of these units that were developed.

Exhibit 18: QAP Set-Aside Levels and FmHA Housing Units

FmHA Funding: Correlation Between Weight of FmHA Set-Aside and Share of FmHA Units Developed

Characteristic of LIHTC housing developed	**QAP Preference**	**Pearson's Correlation Coefficient**
% of FmHA units (1987-1992)	FmHA (1990)	.406
% of FmHA units (1993-1998)	FmHA (2001)	.571

Source: Urban Institute

Other states used other explicit rural-based preferences to target rural communities. In 1990, states with preferences for rural areas indeed tended to develop more units in non-metro areas (see Exhibit 19)[14]. The pattern in 1990 was very strong but by 2001 it weakened, suggesting that states with these preferences developed more units in urban areas. This seems to indicate that rural-based preferences had less impact over time on the shares of units developed in rural areas.

Exhibit 19: QAP Preferences and Non-Metro LIHTC Production

Metro/non-metro: The Average State-level Share of Units Developed in Non-Metro Areas, by Absence/Presence of QAP Preferences and Set-Asides, by Year

	1987-1992 Mean		**1993-1998 Mean**	
	No Preference/ Set-aside in 1990	*Preference/ Set-aside in 1990*	*No Preference/ Set-aside in 2001*	*Preference/ Set-aside in 2001*
Rural preference and % of units developed in non-metro areas	28%	35%	29%	26%

Note: Means given represent the average percentage of units developed in urban areas during the period.
Source: Urban Institute

Our data do not suggest that rural set-asides had any impact on the share of units developed in rural areas. Furthermore, the weights of rural preferences and set-asides did not appear to correlate with actual shares of rural units developed between 1987 and 1998.

HUD-Designated Areas. In 1990, there did not appear to be any relationship between states with preferences for HUD-designated areas and the share of LIHTC units developed in such areas between 1987 and 1992. The strong inverse relationship that we observed in 2001 was probably an artifact of the federal requirement for states to include such preferences in their

[14] The comparison of rural preference with non-metro areas is not perfect because it is possible for rural counties to be located in MSAs. While the geographic definitions of metro/non metro and urban/rural do not match exactly, we do not have data on LIHTC projects that were developed in rural counties specifically. However, we feel that there is probably enough crossover for us draw general conclusions about the relationships that we observed.

QAPs. In 1990, only 42 percent of the states had this preference as compared with 2001 when 71 percent of states included it. As a result, the relationship may be an artificial one since states that rarely did projects in QCTs from 1993 to1998 were required to include this preference by 2001.

The weight of QCT preferences in 1990, however, appears to have a relatively strong impact on the share of units developed between 1987 and 1992 (see Exhibit 20). It appears that merely having the preference did not make much of a difference but strong preferences did have an impact. In 2001, this relationship did not apply, possibly because of the exogenous pressure to include QCT preferences. We did not find any QCT-based set-asides in either 1990 or 2001 so we can not draw any conclusions about relationships between absence/presence or weight in either year.

Exhibit 20: QAP Preference Weights and LIHTC Production in QCTs

QCTs: Correlation Between Weight of QCT Preferences and Share of Units Developed in QCTs

Characteristic of LIHTC housing developed	QAP Preference	Pearson's Correlation Coefficient
% of units developed that were developed in QCTs (1987-1992)	QCT projects (1990)	.519
% of units developed that were developed in QCTs (1993-1998)	QCT projects (2001)	-.042

Source: Urban Institute

States with 1990 preferences for Difficult to Develop Areas (DDAs) tended to develop more of these projects during the late 1980s and early 1990s (see Exhibit 21). This trend reversed between 1993 and 1998, when states that did not have DDA preferences appeared to develop more DDA units. This may be explained by the fact that only about half as many states had these preferences in 2001 (33 percent) as compared with 1990 (57 percent). It is possible that the states which dropped their DDA preferences had attractive markets for DDA developments. As a result, developers may have been drawn to these areas by the 130 percent eligible basis rule regardless of whether or not there were QAP preferences in place. If the states that were developing most of the DDA projects dropped their preferences because they did not need them by 2001, this may have left only those states that were using preferences as walls to preserve trickles of DDA development.

There were no apparent correlations between how much weight states assigned to DDA preferences and the shares of units that were eventually developed. Furthermore, no DDA set-asides were implemented in any of the states so we could not draw any conclusions about their impacts on production.

Exhibit 21: QAP Preferences and LIHTC Production in DDAs

DDAs: The Average State-level Share of Units Developed in DDAs, by Absence/Presence of QAP Preferences and Set-Asides, by Year

	1987-1992 Mean		**1993-1998 Mean**	
	No Preference in 1990	*Preference in 1990*	*No Preference in 2001*	*Preference in 2001*
DDA preference and % of units developed in DDAs	20%	41%	32%	19%

Note: Means given represent the average percentage of units developed in urban areas during the period.

Source: Urban Institute

As a final portion of the analyses, we analyzed the impacts that QAP preferences/set-asides for vacancy rates and very low-income renters had upon where LIHTC projects were ultimately developed from 1991-1998. Our goal was to determine whether or not there was a relationship between QAP provisions that targeted areas with particular vacancy rates, as well as provisions for 'very low' income households, and the characteristics of the counties in which projects were developed. To make this comparison, we once again utilized the CHAS and LIHTC datasets. Ultimately, we did not observe any substantial differences between counties where LIHTC projects were developed and state averages. We also did not find any patterns between changes in QAP preferences and corresponding needs indicators in the handful of cases where differences did appear significant.

Using the CHAS dataset, we began by calculating average state vacancy rates and state averages for shares of renter households at or below both 30 and 50 percent of HAMFI that spent more than 50 percent of their income on housing. Next, we utilized the LIHTC database to identify the counties in which tax credit projects were developed between 1991 and 1994 and between 1995 and 1998. For 1991-1998, we had information about projects developed in over 2,000 of the total of 3,100 counties in all fifty states. The 1991-1994 units were distributed over 1,662 counties and the 1995-1998 units covered 1,183 counties.

We matched the LIHTC data with county-level CHAS data on vacancy rates and on shares of low-income households who spent more than 50 percent of their income on housing. Weighting the CHAS indicators by the number of units developed, we compared the characteristics of counties in which units were developed with state averages. We wanted to see if the counties where projects were developed were different from the rest of the counties in each state. In states where substantial differences were observed, we looked at QAP preferences and set-asides to see if we could draw any conclusions about how QAPs may have affected where units were developed.

We found that the counties where low-income housing projects were developed did not have vacancy rates that were significantly different from state averages. After weighting the vacancy rates of the counties by the number of LIHTC units developed within them, we were left with a handful of states where we observed noticeable differences from state averages. Unfortunately, there were too few cases of states with significant differences for us to conclude anything about the possible effect of QAPs on where projects were developed. Of the 13 states that stipulated vacancy rate-based preferences, we lacked complete information about their QAPs in both 1990 and 2001 for three of the states. Other states that had preferences—such as Idaho, Louisiana, Iowa, Oregon, Tennessee, Vermont and Wyoming—also could not be analyzed because we observed less than 1 percent differences between state averages and averages for LIHTC counties in 1990. Two states that had vacancy rate preferences and where we observed what appeared to be significant differences were Montana and Utah.

In Montana, where the 1990 state average vacancy rate was 10 percent we noted an 11 percent vacancy rate for the 1991-1994 projects which dropped to an 8 percent vacancy rate for the 1995-1998 group. While the change was small, we compared corresponding changes in the QAP between 1990 and 2001 and found that the state had a vacancy rate preference in 1990 but dropped it by 2001. Assuming that the state had dropped the preferences in the mid to late-1990s, it appears contradictory that more units would be developed in areas with lower vacancy rates. We expected that such a shift would correspond to strengthening corresponding QAP preferences, not loosening preferences.

In Utah, we observed the opposite trend. The state average vacancy rate was 9 percent in 1990, but counties in which LIHTC projects were developed between 1991-1994 had an average vacancy rate of 14 percent. The average for the 1995-1998 group was 16 percent and, like Montana, Utah dropped its vacancy rate preference during the 1990s. Unlike Montana, more projects were developed in counties with looser real estate markets, where vacancy rates were higher.

We also found no apparent relationship between QAPs and LIHTC county averages for shares of renter households at or below 30 percent HAMFI who paid more than 50 percent of their income for rent in 1990. We then compared the state averages for low-income, renter households with averages for counties where LIHTC projects were developed. We found approximately 21 states with averages that differed by more than a three percentage points, and for which we had complete information on corresponding “very low” income preferences. Twenty-one of the states weakened their preferences between 1990 and 2001, while seven states strengthened them. An additional three states did not change the strength of their very low-income preferences at all. Regardless of whether the states strengthened or weakened their very-low income preferences between 1990 and 2001, LIHTC projects were developed in higher income counties, that is, in counties with below average shares of low-income renters. This suggests that there was no pattern in impact of QAP preferences upon targeting counties with large shares of low-income renters. We carried out a parallel analysis for renters who were below 50 percent HAMFI, which demonstrated similarly ambiguous results.

We did not find any evidence suggesting that vacancy rate preferences and preferences that target very low-income renter households had an impact upon where LIHTC projects were developed. However, it is possible that average county-level vacancy and renter poverty rates changed during the 1990s, which would weaken our comparison with projects developed between 1995-1998. Furthermore, there were very few states with clear preferences that targeted vacancy rates. Paired with the fact that we observed only two states that had significant differences between state-average vacancy rates and average vacancy rates for LIHTC counties, we could not draw any firm conclusions about their impact.

Conclusion. We found no relationship between our measures of state-level housing needs and QAP preferences or set-asides designed to target these needs. We did, however, find substantial relationships between QAPs and the characteristics of LIHTC units developed. The roles of QAP preferences and set-asides can be characterized as acting as either ‘walls’ to protect certain development activities, or ‘wedges’ to leverage desirable development activities. Sheltering non-profit developers in the early 1990s to foster their growth can be considered a ‘wall’ preference, while preferences and set-asides that appeared to promote development activities that went against industry trends such as new construction, rehabilitation, QCT, and DDA development acted as wedges. Furthermore, we did not observe any impact of vacancy rate and very low-income preferences the counties in which units were ultimately developed.

4. QAP PREFERENCES AND SET-ASIDES AS MEASURES OF STATE ACTIVISM

Thus far, our analysis has focused on individual QAP preferences and set-asides, including their prevalence, their relationship to statewide needs, and possible impacts on LIHTC production. This section combines individual preferences and set-asides to examine states' overall activism in using QAPs to encourage particular types of LIHTC development. Using a simple typology, states are classified in terms of their levels of activism in using QAPs to promote "people-based" and "place-based" priorities. This allowed us to compare states in general terms and to explore changes in their levels of place- and people-based activism through the 1990s.

We first categorized preferences and set-asides as being either people-based or place-based. These groupings are summarized in Exhibit 21. We then constructed a place-based

Exhibit 21: Place-Based and People-Based QAP Priorities

QAP preference/set-aside category	Aggregate Variable
Place-based	1. Metro/non metro 2. Community size 3. Improvement area 4. Vacancy rate 5. Poverty rate
People-based	1. Special needs 2. Very low income 3. Homeless 4. Public housing residents/waiting lists 5. Large families 6. Elderly 7. Minorities 8. Minority/women-owned businesses

score and a people-based score for each state (for 1990 and for 2001), assigning the state one point for each place-based or people-based preference/set-aside category that its QAP addressed. Preferences and set-asides were weighted equally, [15] and after summing the scores we established three ranges for each score (see Exhibit 22).

Exhibit 22: Activism Score Ranges

Scoring cut-offs for people and place based preference/set-aside ranges	
Score	**Category**
People-based	
0-4	Low
5-7	Medium
8-10	High
Place-based	
0	Low
1-3	Medium
4-7	High
**Maximum possible people-based score was '16' – 8 possible people-base preference categories plus 8 possible set-asides. The maximum possible place-based score was '10' – 5 possible place-based preference categories plus 5 possible set-asides.*	

State Activism in Pursuing People-Based Priorities

We began by analyzing people-based preferences and set-asides in both 1990 and 2001 to better understand how states differed and whether they changed their policies during the 1990s. Exhibit 23 classifies states according to their activism scores on people-based priorities in 1990 and 2001. States that are listed in the boxes along the diagonal axis extending from the upper left corner to the lower right did not significantly change their people-based activism during the 1990s. States listed below and to the left of this diagonal reduced their

[15] We experimented with weighing the set-asides more heavily than the preferences because they represented stronger policy commitments. The result had very little impact of the state rankings so we decided, rather than assign the set-asides an arbitrary weight, to count both the preferences and set-asides equally.

levels of activism, while states listed above and to the right of the diagonal increased their levels of activism during the period.

Exhibit 23: People-Based Activism, 1990 and 2001

Levels of Activism (based on people-based preferences and set-asides)

	Low 2001		HIGH 2001
Low 1990	Florida Oklahoma Rhode Island	Maryland Montana Nebraska North Carolina North Dakota Oregon	Illinois
	Georgia Hawaii Minnesota Mississippi Nevada New York	Alaska Arizona Colorado Connecticut Delaware Kansas Kentucky Louisiana Missouri New Hampshire New Mexico Ohio Pennsylvania South Dakota Tennessee Texas Utah Vermont Virginia Washington West Virginia Wisconsin Wyoming	Indiana Iowa New Jersey
HIGH 1990		Massachusetts Michigan South Carolina	

Note: 1990 QAPs not available for Alabama, Arkansas, California, & Maine.

Representing one extreme, states listed within the upper left box had the weakest people-based preferences in both 1990 and 2001. These states included Florida, Oklahoma, and Rhode Island, all of which had only three or four people-based preferences or set-asides in both 1990 and 2001. Illinois increased its activism the most during the period, essentially doubling the number of people-based preference and set-aside categories it targeted from four in 1990 to eight in 2001.

We observed a general pattern of states clustering in the middle in both 1990 and 2001 which indicated that there was not much of a shift towards or away from people-based categories in either year. About the same number of states reduced their activism as expanded it. However, no states dropped from having high scores in 1990 to having low scores in 2001. Although states made a significant number of changes in the specific types of people-based preferences that they adopted, there was relatively little change in their overall activism. Most of the significant changes that occur centered around homeless, PHA, very low-income, and elderly preferences. Between 1990 and 2001 a net of six states dropped their homeless preferences. Four states also gave up their preferences for public housing residents. The largest net increases occurred in the number of states with preferences for very low-income households, with six states adding such preferences or set-asides between 1990 and 2001. By 2001, four more states gave preference to elderly households.

Exhibit 24: Place-Based Activism, 1990 and 2001

Levels of Activism (based on place-based preferences and set-asides)

	Low 2001	⟵ ⟶	High 2001
Low 1990	Wisconsin	Hawaii Rhode Island Vermont	
↕	Iowa Minnesota	Alaska Connecticut Illinois Kansas Kentucky Maryland Massachusetts Mississippi Montana New York South Dakota Wyoming	Arizona Delaware Florida Georgia Indiana Louisiana Nebraska Nevada New Jersey New Mexico North Carolina North Dakota Ohio Oklahoma Pennsylvania South Carolina Tennessee Virginia Washington West Virginia
High 1990		Colorado Idaho New Hampshire	Michigan Missouri Oregon Texas Utah

Note: 1990 QAPs not available for Alabama, Arkansas, California, & Maine.

State Activism in Pursuing Place-Based Priorities

Exhibit 24 classifies states according to their activism scores on place-based priorities in 1990 and 2001. Again, the states listed within boxes along the diagonal did not significantly change their levels of activism between 1990 and 2001. At one extreme, Wisconsin ranked low on place-based policy activism in both 1990 and 2001. At the other end of the spectrum, Michigan, Missouri, Oregon, Texas, and Utah all ranked very high in both years. No states shifted from one extreme to another. As in the people-based chart above, we observed some reduction in activism, with states such as Iowa and Minnesota shifting from medium to low levels of place-based activism between 1990 and 2001. Colorado, Idaho, and New Hampshire also went from being highly activist in place-based preferences and set-asides, to average.

We observed a general increase in the number of place-based preference/set-asides in most states. For example, the center box in the right column, as well as the two right-most boxes in the top row, list all the states that increased their levels of during the period. These three boxes show that over half of the states increased their numbers of place-based preferences and set-asides between 1990 and 2001. Most of this shift can be explained by the net increase of 25 states with preferences for projects developed in targeted improvement areas. Correspondingly, a net of 13 states added preferences based on area poverty rates, the category in which we recorded preferences for QCTs. As a result, a substantial portion of this overall change can be attributed to the federal requirement that states give preferences to projects in QCTs that contribute to community revitalization plans. Aside from these requirements, a net of eight states added metro/non-metro preferences and set-asides while an additional eight states added preferences based on community size between 1990 and 2001.

Balance Between People- and Place-Based Priorities

How have states balanced their levels of activism on people-based and pace-based priorities? Exhibits 25 and 26 illustrate the distribution of activism levels in 1990 and 2001, respectively. In these exhibits, states listed along the diagonal stretching from the upper left to lower right corners can be considered ‘balanced’; with about the same level of activism for both people-based and place-based categories. Rhode Island, for example, was the weakest in both categories in 1990, while at the other extreme, Michigan was the strongest in both categories in 1990. Oregon was the least balanced in 1990, leaning heavily towards place-based preferences and set-asides.

In 2001, Minnesota was the least activist state, ranking the lowest in both people and place-based preferences and set-asides. Indiana and New Jersey were the most activist in both categories. The most ‘unbalanced’ states were Florida, Georgia, Nevada, and Oklahoma, which primarily pursued place-based priorities, while Iowa focused primarily on people-based priorities.

Exhibit 25: People-Based and Place-Based Activism in 1990

Levels of Activism (based on 1990 people and place-based preferences and set-asides)

Place-based ↓ / People-based →	Low		HIGH
Low	Rhode Island	Hawaii Vermont Wisconsin	
	Florida Illinois Maryland Montana Nebraska North Carolina North Dakota Oklahoma Wyoming	Alaska Arizona Connecticut Delaware Georgia Indiana Iowa Kansas Kentucky Louisiana Minnesota Mississippi Nevada New Jersey New Mexico New York Ohio Pennsylvania South Dakota Tennessee Virginia Washington West Virginia	Massachusetts South Carolina
HIGH	Oregon	Colorado Idaho Missouri New Hampshire Texas Utah	Michigan

Note: 1990 QAPs not available for Alabama, Arkansas, California, & Maine.

Exhibit 26: People-Based and Place-Based Activism in 2001

Levels of Activism (based on 2001 people and place-based preferences and set-asides)

Place-based ↓ / People-based →	Low		High
Low	Minnesota		Iowa
	Hawaii Mississippi New York Rhode Island	Alabama Alaska Arkansas California Colorado Connecticut Idaho Kansas Kentucky Maine Maryland Massachusetts Montana New Hampshire South Dakota Vermont Wyoming	Illinois
High	Florida Georgia Nevada Oklahoma	Arizona Delaware Louisiana Michigan Missouri Nebraska New Mexico North Carolina North Dakota Ohio Oregon Pennsylvania South Carolina Tennessee Texas Utah Virginia Washington West Virginia Wisconsin	Indiana New Jersey

In addition to indicating how activist states were overall in both 1990 and 2001, this analysis highlights the nature of the changes in QAP preferences and set-asides over the course of the decade. For example, when states revised their QAP preferences and set-asides, did they tend to move in any particular direction? Did states that focused primarily on either people- or place-based priorities in 1990 tend to balance their QAPs by 2001? Or did states tend to become more focused on one set of priorities over the other? To address these questions, we grouped states into three categories, based on the changing balance between people-based and place-based activism (see Exhibit 27).

Exhibit 27: Changing Patterns of State Activism

Characteristics of Change Between 1990 and 2001 QAPs

Category	*Definition*
Place-based shift	States that experienced net increases between 1990 to 2001 in place-based preferences and set-asides relative to people-based. Category includes states that added place-based preferences or lost people-based preferences.
No relative shift	States that experienced no net increases between 1990 to 2001 in people or place-based preferences or set-asides. Category includes states that added or lost both place- and people-based preferences in equal proportions, as well as state that did not experience any changes at all.
People-based shift	States that experienced net increases between 1990 to 2001 in people-based preferences and set-asides relative to place-based. Category includes states that added people-based preferences or lost place-based preferences.

Most of the states that were focused on either place-based or people-based in 1990 tended to shift toward greater balance by 2001. Specifically, most of the states that were people-biased—including Hawaii, Massachusetts, South Carolina, Vermont, and Wisconsin—had net increases in their place-based activism scores by 2001. Furthermore, all the states that had a relative shift towards people-based preferences and set-asides in 2001 were focused primarily on place in 1990 (see Exhibit 28).

Most of the states with 'balanced' activism in 1990 shifted shifts toward greater place-based activism. The remainder showed no significant shift at all, with Iowa being the only 'balanced' state in 1990 that moved toward people-based activism in 2001. These place-based shifts can likely be attributed to the addition of the federally-required preferences for targeted improvement areas and QCTs, as discussed earlier.

Exhibit 28: Changes in State Activism, 1990-2001

Direction of Shift in QAP Preference and Set-Asides (1990-2001)

	Place-based shift	***No relative shift***	***People-based shift***
States that were 'unbalanced' in 1990	Florida Hawaii Massachusetts Oklahoma Rhode Island South Carolina Vermont Wisconsin	Missouri Nebraska North Carolina North Dakota Texas Utah	Colorado Idaho Illinois Maryland Montana New Hampshire Wyoming Oregon
States that were 'balanced' in 1990	Arizona Delaware Georgia Louisiana Michigan Mississippi Nevada New Mexico New York Ohio Pennsylvania Tennessee Virginia Washington West Virginia	Alaska Connecticut Indiana Kansas Kentucky Minnesota New Jersey South Dakota	Iowa

Source: Urban Institute

Conclusion

States tended to vary widely in their levels of activism for people- and place-based preferences and set-asides. While there appeared to be no general shift, either positive or negative, in the direction that states moved for people-based preferences or set-asides, at least half of the states increased their place-based provisions. Furthermore, states that primarily focused on either people or place-based preferences in 1990 tended to shift the composition of their QAPs to move toward greater balance by 2001. States that were balanced in1990 generally increased their levels of place-based activism by 2001.

What could motivate a state that was heavily biased towards either people- or place-based preferences/set asides to move towards a more balanced scheme? A political system that is based on geographic representation naturally tends to favor distributions of resources on geographic bases. This could explain a general bias for QAPs to incorporate geographic preferences. It is reasonable to assert that place-based preferences are more easily designed because local stakeholders can readily determine where tax credit resources are distributed. If a specific region is not receiving what it considers a reasonable share of resources, representatives of such regions can apply political pressure at state levels to revise QAP policies. In this way, it would seem natural for there to be net increases in place-based preferences relative to people-based preferences.

By contrast, geographic-based political systems do not favor distribution of tax credit resources based on needs assessments meant to help target particular population groups. It is difficult to determine which types of households LIHTC developments are targeting. Data collection for such analysis is more complicated, may be vulnerable to inaccuracies, and reporting systems for such information may not be established. Therefore, if a locality does not exhibit obvious clusters of specific types of households that local stakeholders would be motivated to target through place-based preferences, people-based housing needs may not be realized by local constituencies. Furthermore, the types of constituencies that LIHTC projects are usually targeted to, such as households with very low-incomes, often have very weak political voices. Most likely, this further weakens the manifestation of people-based preferences.

As a result, geographic preferences seem likely to ‘win out’ over people-based preferences. A relative deficiency of people-based preferences at the state level may indicate that thorough needs assessments have not been completed, systems for reporting needs may not be in place, or that households with the greatest needs may not have strong political voices.

APPENDICES

Appendix "A" – Sample QAP Database Inventory Form

A. Project/Housing Development Location

ID: 62

QAP Reviewer: Jeremy

Date QAP Entered: 11/13/2001

State being Reviewed: Wisconsin

Year: 2001

Interview Scheduled?:

Name of Interviewer:

Date of Intervew:

Review Complete: ☐

1. Metro/non-Metro: Preference based on Metro/non-Metro Areas? No

- Has a specific percentage of credit been set- aside for these projects? No

- References to these preferences or set aside below:

s

2. Community Size: Preference based on community size? Yes

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set aside below:

1. Rural Location 14 points
To encourage development in rural areas of the State where there is demonstrated need, developments will receive scoring points located in any county in the State except the following nine most populous counties: Brown, Dane, Kenosha, Milwaukee, Outagamie, Racine, Rock, Waukesha, and Winnebago.

3. TAP: Preference based on targeted improvement area? No

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set aside below:

4. Other Geographic preferences? No

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set-asides below

B. Local Housing Needs Characteristics

State being Reviewed: Wisconsin Year: 2001 ID: 62

Locality Wide:

5. Vacancy Rates: Preference for projects in localities with particular vacancy rates? No

- Has a specific percentage of credit been set- aside for these projects? No

- References to these preferences or set aside below:

---

6. Income Levels: Preference for projects in localities with particular poverty/ income levels? Yes

- Has a specific percentage of credit been set- aside for these projects? Yes

- Paste any references to these preferences or set aside below:

3. Preservation Set-Aside. Twenty percent (20%), or approximately $1,305,875, of the total State housing Credit ceiling will be set aside for the preservation of qualifying housing units and the strengthening of neighborhoods experiencing extreme poverty and economic distress. Unused Credit remaining in the Preservation Set-Aside will be made available in the General Set-Aside. Developments must apply in one category only - a, b, or c.

a. Federally Assisted Housing Preservation. Low-income housing units subsidized under the following programs: Section 236, Section 221(d)(3) Below Market Rate (BMIR), Section 221(d)(3) Market Rate with Section 8 rental assistance, Section 8 project-based new construction, Section 221(d)(4), and Section 515- Rural Housing Development.

b. Neighborhood Preservation. The following Milwaukee census tracts are targeted for Neighborhood Preservation: 83, 84, 85, 86, 87, 100,101, 102, 103, 104, 115, 116, 117, 118, 119, 138, 139, 140,141, 142.

c. Other Preservation. Developments that have historic significance in the local community, adaptive reuse of existing buildings, and conversion of existing market rate developments to affordable housing.

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7. PHA: Preference for projects that make provisions to households on Public Housing Authority waiting lists? No

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set aside below:

---

8. Other: Preference in localities for other reasons? No

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set-asides below

---

Neighborhood Wide:

9. Vacancy: Preference for project in neighborhoods with particular vacancy rates? No

- Has a specific percentage of credit been set- aside for these projects? No

- References to these preferences or set aside below:

---

10. Poverty: Preference for projects in neighborhoods with particular poverty/income levels? Yes

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set aside below:

FEDERALLY DESIGNATED QUALIFIED CENSUS TRACTS ELIGIBLE FOR 130% CREDIT
City Census Tract(s)
Appleton 101
Beloit 15
Eau Claire 11
Fond du Lac 406
Green Bay 1, 8, 9, 10 & 12
Janesville 1
Kenosha 10 & 11
La Crosse 3, 4 & 5
Madison 11, 14.01, 16.01, 16.02, 17, 25.98 & 32
Milwaukee 12, 18, 21, 28, 40, 42, 44, 45, 46, 47, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 96, 97, 98, 99, 100, 101,102, 103, 104, 105, 106, 107, 108, 110, 111, 112,113, 115, 116, 117, 118, 119, 120, 121, 122, 123, 132, 134, 135, 136, 137, 138, 139, 140, 141, 142, 146, 147, 148, 149, 150, 151, 154, 155, 156, 157, 158, 159, 163, 164, 165, 166, 167, 168, 169, 174, 175, 177, 178.98
Oshkosh 6 & 7
Racine 1, 3, 4, 5 & 10.01
Sheboygan 5 & 6
Superior 201 & 202
County Census Tract
Ashland 9501
Menominee 9701
Portage 9610
Sawyer 9807
Vilas 9509
Walworth 5

11. Other: Preference in neighborhoods for other reasons? Yes

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set aside below:

2. Infill Development 15 points

Developments that maximize land use efficiency through development within established urban service areas.

C. Financing Characteristics

State being Reviewed: Wisconsin **Year:** 2001 **ID:** 62

12. Government Funding: Does the agency make any special use of, or cite a preference for, projects using other government funding? Yes

- Has a specific percentage of credit been set- aside for these projects? No

- References to these preferences or set aside below:

15. Financial Participation 24 points
Developments that have financial participation, supported by written documentation, from one or more of the following sources:
(a) Federal, state, county or city governments

(b) Public housing authorities
(c) Wisconsin Department of Administration, Tax Exempt Bonding Authorities and Division of Housing and Intergovernmental Relations
(d) Public or private foundations
(e) Incentives for historic preservation

3. Local Support 24 points
Developments demonstrating strong community support through elected officials and other leaders or neighborhood groups. Additional consideration is given for indirect financial support.

13. Tax-exempt Financing: Does the agency make any special use of, or cite a preference for, projects using tax-exempt financing? No

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set aside below:

14. Developer Equity: Does the agency cite a preference for projects using equity from the developer? No

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set aside below:

15. Other: Does the agency cite a preference for projects with other financing characteristics? No

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set-asides below

D. Residency Requirements

State being Reviewed: Wisconsin **Year:** 2001 **ID:** 62

16. Low-income: Preference for projects that serve residents that have "very low" incomes? Yes

- Has a specific percentage of credit been set- aside for these projects? No

- References to these preferences or set aside below:

6. Serves the Lowest-Income Tenants 45 points
The Plan gives priority to developments that serve the lowest-income tenants when qualifying tax credit units are set aside for households with incomes and rents at or below the 50% County Median Income level required for Credit developments. Units serving the lowest-income tenants must be representative of the overall unit mix of the development. The Owner will be required to maintain the stated set-aside through a Land Use Restriction Agreement (LURA). Additional Credit incentive may be provided for developments that score in this category and Category 4. Developments serving market-rate and lower-income tenants will be evaluated and may receive an increase of Credit up to the amount calculated by the qualified basis.
To be awarded points, the Market Study (or Market Analysis Summary) for developments of 24 units or fewer) must also address and demonstrate a sufficient market for the lower-income population being targeted.
In order to receive points in this category, collected rents cannot exceed the calculated rents based

on 30% of the targeted lower percentages of County Median Income.

17. Elderly: Preference for projects that serve elderly residents? Yes

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set aside below:

8. Elderly 15 points
Elderly developments with a minimum of four of the following services/amenities: meal services, planned social and recreational activities, 24-hour staff/aid, wellness monitoring/clinic, housekeeping, 24-hour security, scheduled transportation, emergency call system, and other amenities/services.

18. Homeless: Preference for projects that serve the homeless? Yes

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set aside below:

7. Tenant Populations with Special Needs 12 points
(a) Developments that set aside qualifying tax credit units that are intended for occupancy by one or more of the following populations:
(i) Persons with physical disabilities.
(ii) Homeless individuals or families.
To be awarded points, the Market Study (or Market Analysis Summary) for projects of 24 units or fewer) must also address and show that there is a sufficient market for the population being targeted. The applicant must also provide a description of architectural features and a service and marketing plan to demonstrate that the development will serve this population. (9 points)

19. Minorities: Preference for projects that serve minority residents? No

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set-asides below

20. Large families: Preference for projects that serve large families? Yes

- Has a specific percentage of credit been set- aside for these projects? No

- References to these preferences or set aside below:

5. Serves Large Families (Three-bedroom or larger units) 12 points
Developments in which a minimum of 10% and a maximum of 50% of the units contain three bedrooms or more.

21. Former PHA: Preference for projects that serve former public housing residents? No

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set aside below:

22. Special Needs: Preference for projects that serve special needs residents? Yes

- Has a specific percentage of credit been set- aside for these projects? **No**

- Paste any references to these preferences or set aside below:

7. Tenant Populations with Special Needs 12 points
(a) Developments that set aside qualifying tax credit units that are intended for occupancy by one or more of the following populations:
(i) Persons with physical disabilities.
(ii) Homeless individuals or families.
To be awarded points, the Market Study (or Market Analysis Summary) for projects of 24 units or fewer) must also address and show that there is a sufficient market for the population being targeted. The applicant must also provide a description of architectural features and a service and marketing plan to demonstrate that the development will serve this population. (9 points)

E. Project Activities and Types

State being Reviewed: Wisconsin **Year:** 2001 **ID:** 62

Project Activities

23. New Construction: Preference for projects proposing new construction? **No**

- Has a specific percentage of credit been set- aside for these projects? **No**

- References to these preferences or set aside below:

24. Rehabilitation: Preference for projects proposing substantial rehabilitation of an existing property? **Yes**

- Has a specific percentage of credit been set- aside for these projects? **No**

- Paste any references to these preferences or set aside below:

10. Rehabilitation 36 Points
Developments that rehabilitate, reuse or restore existing structures, including historic rehabilitation.
Points will be awarded based on hard costs only.
Proposals for 24 units or more, not involving "gut" rehabilitation, must include an account of the capital needs requirements of the subject property. This account may be performed by either a third-party capital needs specialist or can be a letter from the lender, syndicator or consultant stating that the rehabilitation proposed for the building is "reasonable" based on the current overall physical condition of the building(s). As appropriate, this account should identify significant deferred maintenance, existing deficiencies, and material building code violations that affect the property's use and its structural and mechanical integrity.

25. Acquisition: Preference for projects that propose the acquisition of an existing property? **No**

- Has a specific percentage of credit been set- aside for these projects? **No**

- Paste any references to these preferences or set aside below:

Project Types

26. Mixed Use: Preference for mixed-use projects? **No**

- Has a specific percentage of credit been set- aside for these projects? **No**

- Paste any references to these preferences or set-asides below

27. SRO: Preference for Single Room Occupancy (SRO) Projects? **No**

- Has a specific percentage of credit been set- aside for these projects? **No**

- References to these preferences or set aside below:

28. Multi-family: Preference for multi-family projects? **No**

- Has a specific percentage of credit been set- aside for these projects? **No**

- Paste any references to these preferences or set aside below:

29. At-risk: Preference for projects that support "at-risk" properties? **Yes**

- Has a specific percentage of credit been set- aside for these projects? **Yes**

- Paste any references to these preferences or set aside below:

3. Preservation Set-Aside. Twenty percent (20%), or approximately $1,305,875, of the total State housing Credit ceiling will be set aside for the preservation of qualifying housing units and the strengthening of neighborhoods experiencing extreme poverty and economic distress. Unused Credit remaining in the Preservation Set-Aside will be made available in the General Set-Aside. Developments must apply in one category only - a, b, or c.

a. Federally Assisted Housing Preservation. Low-income housing units subsidized under the following programs: Section 236, Section 221(d)(3) Below Market Rate (BMIR), Section 221(d)(3) Market Rate with Section 8 rental assistance, Section 8 project-based new construction, Section 221(d)(4), and Section 515- Rural Housing Development.

b. Neighborhood Preservation. The following Milwaukee census tracts are targeted for Neighborhood Preservation: 83, 84, 85, 86, 87, 100,101, 102, 103, 104, 115, 116, 117, 118, 119, 138, 139, 140,141, 142.

c. Other Preservation. Developments that have historic significance in the local community, adaptive reuse of existing buildings, and conversion of existing market rate developments to affordable housing.

F. Building Characteristics

State being Reviewed: Wisconsin **Year:** 2001 **ID:** 62

30. Unit Size: Preference for projects based on size of projects? **Yes**

- Has a specific percentage of credit been set- aside for these projects? **No**

- References to these preferences or set aside below:

5. Serves Large Families (Three-bedroom or larger units) 12 points
Developments in which a minimum of 10% and a maximum of 50% of the units contain three bedrooms or more.

31. Total Units: Preference based on projects based on total number of units? **Yes**

- Has a specific percentage of credit been set- aside for these projects? **No**

- Paste any references to these preferences or set aside below:

9. Small Developments 18 points
Developments that have 24 or fewer units.

G. Project Sponsor and Project Costs

State being Reviewed: Wisconsin **Year: 2001** **ID: 62**

Project Sponsor

32. Non-profit type: Preference for credit based on type of non-profit? **No**

- Has a specific percentage of credit been set- aside for these projects? **No**

- References to these preferences or set aside below:

33. Non-profit region: Preference based on non-profit's region? **Yes**

- Has a specific percentage of credit been set- aside for these projects? **Yes**

- Paste any references to these preferences or set aside below:

2. Nonprofit Set-Aside. Ten percent (10%), or approximately $652,936, of the total State housing Credit ceiling must be set aside for qualified nonprofit organizations that have an ownership interest in a Credit development. This Credit amount cannot be used for any other purpose and any unused Credit may be carried over at the end of the allocation year. A nonprofit may submit an application for either the Nonprofit Set-Aside or the General Set-Aside.
The nonprofit must be a "qualified nonprofit organization" as defined in Section 42 of the Code. Section 42 of the Code defines a "qualified nonprofit organization" as any organization that: 1) is described in paragraphs (3) or (4) of section 501(c) of the Code; 2) is exempt from tax under section 501(a) of the Code; and 3) has as one of its exempt purposes the fostering of low-income housing which include nonprofit organizations meeting one of the following criteria:

a. Neighborhood-based nonprofit organization: An association or corporation duly organized to promote and undertake housing activities on a not-for-profit basis within a specified neighborhood. An organization is considered to be neighborhood-based if the majority of its membership, clientele, or governing body are residents of the neighborhood where activities are to be carried out. This definition includes Community Housing Development Organizations (CHDO), which are also eligible to apply.

b. Housing development organizations operating within a city or county: Its members and/or board should be representative of its area of operation. That is, a majority of its membership, clientele, or governing body should be residents of the city or county where the activities are to be carried out.

c. Housing development organizations operating within a defined region of the State: Its members and/or board should be representative of its area of operation. That is, a majority of its membership, clientele, or governing body should be residents of the region where the activities are to be carried out.

34. Non-profit Activity: Preferenc for non-profit based on type of activity? **No**

- Has a specific percentage of credit been set- aside for these projects? **No**

- Paste any references to these preferences or set aside below:

35. MBWE: Distribution of credit based on MBWE? No

- Has a specific percentage of credit been set- aside for these projects? No

- Paste any references to these preferences or set aside below:

Project Costs

36. Limited total costs: Does the QAP indicate a limitation on total project costs? No

- Paste any references to these limitations:

37. Limit per unit cost: Does the QAP indicate a limitation on per unit costs? No

- Paste any references to these limitations:

38. Fees: Does the QAP indicate any special rules regarding fees? No

- Paste any references to these limitations:

39. BSPRA: Does the QAP indicate any special rules regarding Builder's and Sponsor's Profit and Risk Allowance? No

- Paste any references to these limitations:

40. Syndication: Does the QAP indicate any special rules regarding syndication? No

- Paste any references to these limitations:

41. Legal fees: Does the QAP indicate any special rules regarding legal fees? No

- Paste any references to these limitations:

H. Rents and Affordability

State being Reviewed: Wisconsin **Year:** 2001 **ID:** 62

42. Excess 20-50/40-60: Does the QAP create any special provisions regarding stock affordability in excess of 20-50/40-60? No

- Paste any references to these preferences or set aside below:

43. Excess 10-40/2x Tests: Does the QAP create any special provisions regarding stock affrodability in excess of 10-40/2X tests? No

- Paste any references to these preferences or set aside below:

I. Other and Remaining Questions

State being Reviewed: Wisconsin **Year:** 2001 **ID:** 62

44. Delegation: Have provisions been made for the delegation of authority to other agencies? No

- Paste any references to these preferences or set aside below:

45. Are there any eligibility period provisions? No

- Paste any references to these preferences or set aside below:

46. Please list any other provisions in the QAP that are not captured in the protocol.

Historic Preservation

3. Preservation Set-Aside. Twenty percent (20%), or approximately $1,305,875, of the total State housing Credit ceiling will be set aside for the preservation of qualifying housing units and the strengthening of neighborhoods experiencing extreme poverty and economic distress. Unused Credit remaining in the Preservation Set-Aside will be made available in the General Set-Aside. Developments must apply in one category only - a, b, or c.

a. Federally Assisted Housing Preservation. Low-income housing units subsidized under the following programs: Section 236, Section 221(d)(3) Below Market Rate (BMIR), Section 221(d)(3) Market Rate with Section 8 rental assistance, Section 8 project-based new construction, Section 221(d)(4), and Section 515- Rural Housing Development.

b. Neighborhood Preservation. The following Milwaukee census tracts are targeted for Neighborhood Preservation: 83, 84, 85, 86, 87, 100,101, 102, 103, 104, 115, 116, 117, 118, 119, 138, 139, 140,141, 142.

c. Other Preservation. Developments that have historic significance in the local community, adaptive reuse of existing buildings, and conversion of existing market rate developments to affordable housing.

4. Mixed Income Incentive 40 points
Developments that are mixed-income with points given for up to 40% of the units being setaside for market-rate tenants.

11. Amenities 21 points
Developments with one or more of the following amenities: community space, playground/recreation area, separate entries for family developments, dishwasher and disposal, balcony/patio, garage, and washer/dryer connections (in addition to central laundry).

12. Day Care 12 points
Developments that provide affordable child care facilities operated by licensed providers.

13. Energy Efficiency 10 points
Developments offering components or building materials that decrease energy consumption and/or provide long term environmental benefit.

14. Financial Feasibility 24 points
Developments that demonstrate strong financial feasibility based on, but not limited to, development costs, operating/rent-up reserves, debt coverage ratio, and projected first-year stabilized operating budget and replacement reserves.

16. Sponsor Characteristics 6 points
(a) Developments that are at least 51% owned and at least 51% controlled by minority group members.
OR
(b) The sponsor is a local tax-exempt organization (including local governments and public housing authorities) with previous experience in the development and/or operation of housing similar to that proposed in the application.
17. Development Team 54 points
Development team performance and previous credit program participation including development and financial information.

Duration of Low-Income Use
18. Extends Minimum Duration of Low-Income Use 3 points
Development owner agrees to extend low-income use beyond the 15 years mandated by the IRS. Owners will be required to enter into a Land Use Restriction Agreement (LURA) for 30 years and agree not to implement the termination provision. WHEDA recommends that the applicant consider the overall financial impact to the development when self-scoring in this category.

19. Readiness to Proceed 15 points
Developments that demonstrate ability to proceed quickly by procuring all necessary zoning and related approvals and subordinate financing commitments necessary for project feasibility.

47. Please identify any remaining questions or issues that require additional investigation.

Appendix B – State-by-State QAP Preference and Set-Aside Summary Tables

		1990 metro/non metro preference	1990 metro/non metro set-aside	2001 metro/non metro preference	2001 metro/non metro set-aside
STATE	Alabama	QAP not available	QAP not available	.	.
	Alaska	10.1 - 15%	.	5.1- 10%	5.1- 10%
	Arizona	vague/n.a.	15.1 - 20%	vague/n.a.	5.1- 10%
	Arkansas	QAP not available	QAP not available	.	.
	California	QAP not available	QAP not available	vague/n.a.	15.1 - 20%
	Chicago	.	.	.	.
	Colorado	0.1 - 5%	10.1 - 15%	.	.
	Connecticut	.	.	0.1 - 5%	.
	Delaware	vague/n.a.	5.1- 10%	vague/n.a.	5.1- 10%
	Florida	.	.	vague/n.a.	0.1 - 5%
	Georgia	0.1 - 5%	.	vague/n.a.	25.1 - 30%
	Hawaii	.	.	vague/n.a.	.
	Idaho	vague/n.a.	5.1- 10%	vague/n.a.	5.1- 10%
	Illinois	vague/n.a.	vague/n.a.	0.1 - 5%	.
	Indiana	vague/n.a.	.	vague/n.a.	45.1 - 50%
	Iowa	0.1 - 5%	.	.	.
	Kansas	5.1- 10%	.	0.1 - 5%	.
	Kentucky	vague/n.a.	45.1 - 50%	.	.
	Louisiana	.	.	vague/n.a.	5.1- 10%
	Maine	QAP not available	QAP not available	vague/n.a.	0.1 - 5%
	Maryland	.	.	0.1 - 5%	.
	Massachusetts	.	.	.	.
	Michigan	vague/n.a.	5.1- 10%	vague/n.a.	5.1- 10%
	Minnesota	vague/n.a.	.	.	.
	Mississippi	.	.	vague/n.a.	0.1 - 5%
	Missouri	vague/n.a.	5.1- 10%	vague/n.a.	0.1 - 5%
	Montana	.	.	.	.
	Nebraska	.	.	vague/n.a.	45.1 - 50%
	Nevada	5.1- 10%	.	vague/n.a.	5.1- 10%
	New Hampshire	.	.	.	.
	New Jersey	vague/n.a.	.	vague/n.a.	vague/n.a.
	New Mexico	vague/n.a.	45.1 - 50%	5.1- 10%	5.1- 10%
	New York	.	.	.	.
	North Carolina	vague/n.a.	vague/n.a.	5.1- 10%	.
	North Dakota	.	.	10.1 - 15%	.
	Ohio	10.1 - 15%	.	0.1 - 5%	.
	Oklahoma	5.1- 10%	5.1- 10%	0.1 - 5%	5.1- 10%
	Oregon	0.1 - 5%	5.1- 10%	vague/n.a.	10.1 - 15%
	Pennsylvania	.	.	vague/n.a.	0.1 - 5%
	Rhode Island	.	.	.	.
	South Carolina	15.1 - 20%	.	vague/n.a.	5.1- 10%
	South Dakota	vague/n.a.	15.1 - 20%	0.1 - 5%	.
	Tennessee	.	.	vague/n.a.	60.1 - 65%
	Texas	vague/n.a.	15.1 - 20%	vague/n.a.	10.1 - 15%
	Utah	vague/n.a.	25.1 - 30%	vague/n.a.	5.1- 10%
	Vermont	.	.	.	.
	Virginia	vague/n.a.	45.1 - 50%	vague/n.a.	50.1 - 55%
	Washington	5.1- 10%	.	vague/n.a.	10.1 - 15%
	West Virginia	vague/n.a.	30.1 - 35%	0.1 - 5%	20.1 - 25%
	Wisconsin	.	.	0.1 - 5%	.
	Wyoming	.	.	.	.

		1990 community size preference	1990 community size set-aside	2001 community size preference	2001 community size set-aside
STATE	Alabama	QAP not available	QAP not available	.	.
	Alaska	.	.	.	.
	Arizona	.	.	vague/n.a.	5.1- 10%
	Arkansas	QAP not available	QAP not available	.	.
	California	QAP not available	QAP not available	.	.
	Chicago	.	.	.	.
	Colorado	.	.	.	.
	Connecticut	.	.	.	.
	Delaware	.	.	.	.
	Florida	vague/n.a.	.	vague/n.a.	vague/n.a.
	Georgia	.	.	.	.
	Hawaii	.	.	.	.
	Idaho	.	.	.	.
	Illinois	.	.	.	.
	Indiana	.	.	vague/n.a.	45.1 - 50%
	Iowa	.	.	.	.
	Kansas	.	.	.	.
	Kentucky	.	.	.	.
	Louisiana	.	.	vague/n.a.	40.1 - 45%
	Maine	QAP not available	QAP not available	.	.
	Maryland	vague/n.a.	vague/n.a.	.	.
	Massachusett	.	.	.	.
	Michigan	.	.	.	.
	Minnesota	.	.	.	.
	Mississippi	.	.	.	.
	Missouri	vague/n.a.	.	vague/n.a.	.
	Montana	.	.	.	.
	Nebraska	.	.	.	.
	Nevada	.	.	vague/n.a.	.
	New	threshold	vague/n.a.	.	.
	New Jersey	.	.	.	.
	New Mexico	.	.	vague/n.a.	.
	New York	.	.	.	.
	North Carolina	.	.	vague/n.a.	vague/n.a.
	North Dakota	vague/n.a.	.	vague/n.a.	.
	Ohio	.	.	vague/n.a.	.
	Oklahoma	.	.	.	.
	Oregon	.	.	vague/n.a.	.
	Pennsylvania	.	.	.	.
	Rhode Island	.	.	.	.
	South	.	.	.	.
	South Dakota	.	.	.	.
	Tennessee	.	.	.	.
	Texas	.	.	.	.
	Utah	.	.	vague/n.a.	.
	Vermont	.	.	.	.
	Virginia	.	.	.	.
	Washington	.	.	.	.
	West Virginia	.	.	.	.
	Wisconsin	.	.	0.1 - 5%	.
	Wyoming	.	.	.	.

		1990 targeted improvement area preference	1990 targeted improvement area set-aside	2001 targeted improvement area preference	2001 targeted improvement area set-aside
STATE	Alabama	QAP not available	QAP not available	10.1 - 15%	.
	Alaska	.	.	0.1 - 5%	.
	Arizona	10.1 - 15%	.	0.1 - 5%	.
	Arkansas	QAP not available	QAP not available	vague/n.a.	.
	California	QAP not available	QAP not available	5.1- 10%	.
	Chicago	.	.	vague/n.a.	.
	Colorado	0.1 - 5%	.	vague/n.a.	.
	Connecticut	0.1 - 5%	.	vague/n.a.	.
	Delaware	.	.	vague/n.a.	.
	Florida	vague/n.a.	.	vague/n.a.	.
	Georgia	vague/n.a.	.	0.1 - 5%	.
	Hawaii	.	.	0.1 - 5%	.
	Idaho	5.1- 10%	.	.	.
	Illinois	.	.	0.1 - 5%	.
	Indiana	.	.	.	.
	Iowa	0.1 - 5%	.	.	.
	Kansas	0.1 - 5%	.	0.1 - 5%	.
	Kentucky	.	.	5.1- 10%	.
	Louisiana	.	.	0.1 - 5%	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	.	.	0.1 - 5%	.
	Massachusetts	.	.	0.1 - 5%	.
	Michigan	0.1 - 5%	.	5.1- 10%	.
	Minnesota	.	.	.	.
	Mississippi	.	.	.	.
	Missouri	.	.	.	.
	Montana	.	.	5.1- 10%	.
	Nebraska	.	.	.	.
	Nevada	.	.	0.1 - 5%	.
	New Hampshire	vague/n.a.	.	5.1- 10%	.
	New Jersey	.	.	0.1 - 5%	20.1 - 25%
	New Mexico	.	.	.	.
	New York	5.1- 10%	.	15.1 - 20%	.
	North Carolina	.	.	vague/n.a.	.
	North Dakota	.	.	0.1 - 5%	.
	Ohio	.	.	5.1- 10%	.
	Oklahoma	.	.	0.1 - 5%	.
	Oregon	35.1 - 40%	.	vague/n.a.	.
	Pennsylvania	.	.	vague/n.a.	.
	Rhode Island	.	.	vague/n.a.	.
	South Carolina	.	.	0.1 - 5%	.
	South Dakota	.	.	0.1 - 5%	.
	Tennessee	.	.	0.1 - 5%	.
	Texas	vague/n.a.	.	vague/n.a.	.
	Utah	vague/n.a.	25.1 - 30%	0.1 - 5%	.
	Vermont	.	.	vague/n.a.	.
	Virginia	.	.	0.1 - 5%	.
	Washington	0.1 - 5%	.	0.1 - 5%	.
	West Virginia	.	.	0.1 - 5%	.
	Wisconsin	.	.	vague/n.a.	.
	Wyoming	.	.	0.1 - 5%	.

		1990 vacancy rate preference	1990 vacancy rate set-aside	2001 vacancy rate preference	2001 vacancy rate set-aside
STATE	Alabama	QAP not available	QAP not available	10.1 - 15%	.
	Alaska	.	.	.	.
	Arizona	.	.	.	.
	Arkansas	QAP not available	QAP not available	5.1- 10%	.
	California	QAP not available	QAP not available	.	.
	Chicago	.	.	.	.
	Colorado	.	.	.	.
	Connecticut	5.1- 10%	.	.	.
	Delaware	.	.	.	.
	Florida	.	.	.	.
	Georgia	.	.	.	.
	Hawaii	.	.	.	.
	Idaho	vague/n.a.	5.1- 10%	.	.
	Illinois	.	.	.	.
	Indiana	.	.	.	.
	Iowa	value not recorded in database	.	.	.
	Kansas	.	.	.	.
	Kentucky	.	.	.	.
	Louisiana	5.1- 10%	.	0.1 - 5%	.
	Maine	QAP not available	QAP not available	5.1- 10%	.
	Maryland	.	.	.	.
	Massachuset	.	.	.	.
	Michigan	.	.	.	.
	Minnesota	.	.	.	.
	Mississippi	.	.	.	.
	Missouri	.	.	.	.
	Montana	0.1 - 5%	.	.	.
	Nebraska	.	.	.	.
	Nevada	.	.	.	.
	New	.	.	.	.
	New Jersey	.	.	.	.
	New Mexico	.	.	.	.
	New York	.	.	.	.
	North	.	.	.	.
	North Dakota	.	.	.	.
	Ohio	.	.	.	.
	Oklahoma	.	.	.	.
	Oregon	5.1- 10%	.	vague/n.a.	.
	Pennsylvania	.	.	.	.
	Rhode Island	.	.	.	.
	South	.	.	.	.
	South Dakota	.	.	.	.
	Tennessee	.	.	0.1 - 5%	.
	Texas	.	.	.	.
	Utah	0.1 - 5%	.	.	.
	Vermont	.	.	vague/n.a.	.
	Virginia	.	.	.	.
	Washington	.	.	.	.
	West Virginia	.	.	.	.
	Wisconsin	.	.	.	.
	Wyoming	.	.	5.1- 10%	.

		1990 poverty rate preference	1990 poverty rate set-aside	2001 poverty rate preference	2001 poverty rate set-aside
STATE	Alabama	QAP not available	QAP not available	0.1 - 5%	.
	Alaska	5.1- 10%	.	.	.
	Arizona	.	.	0.1 - 5%	.
	Arkansas	QAP not available	QAP not available	10.1 - 15%	.
	California	QAP not available	QAP not available	.	.
	Chicago	.	.	vague/n.a.	.
	Colorado	10.1 - 15%	.	vague/n.a.	.
	Connecticut	.	.	.	.
	Delaware	.	.	vague/n.a.	.
	Florida	vague/n.a.	.	vague/n.a.	.
	Georgia	0.1 - 5%	.	0.1 - 5%	.
	Hawaii	.	.	0.1 - 5%	.
	Idaho	vague/n.a.	5.1- 10%	0.1 - 5%	.
	Illinois	.	.	.	.
	Indiana	.	.	0.1 - 5%	.
	Iowa	.	.	.	.
	Kansas	.	.	0.1 - 5%	.
	Kentucky	.	.	5.1- 10%	.
	Louisiana	5.1- 10%	.	0.1 - 5%	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	vague/n.a.	.	0.1 - 5%	.
	Massachusetts	vague/n.a.	.	.	.
	Michigan	vague/n.a.	.	5.1- 10%	25.1 - 30%
	Minnesota	.	.	.	.
	Mississippi	5.1- 10%	.	.	.
	Missouri	5.1- 10%	.	vague/n.a.	.
	Montana	.	.	.	.
	Nebraska	5.1- 10%	.	vague/n.a.	.
	Nevada	5.1- 10%	.	0.1 - 5%	.
	New Hampshire	vague/n.a.	.	0.1 - 5%	.
	New Jersey	.	.	5.1- 10%	.
	New Mexico	.	.	0.1 - 5%	.
	New York	vague/n.a.	.	vague/n.a.	.
	North Carolina	.	.	vague/n.a.	.
	North Dakota	5.1- 10%	.	0.1 - 5%	.
	Ohio	10.1 - 15%	.	0.1 - 5%	.
	Oklahoma	.	.	0.1 - 5%	.
	Oregon	.	.	vague/n.a.	.
	Pennsylvania	vague/n.a.	vague/n.a.	vague/n.a.	value not recorded in database
	Rhode Island	.	.	vague/n.a.	.
	South Carolina	.	.	0.1 - 5%	.
	South Dakota	.	.	.	.
	Tennessee	0.1 - 5%	.	15.1 - 20%	.
	Texas	vague/n.a.	.	5.1- 10%	.
	Utah	5.1- 10%	25.1 - 30%	0.1 - 5%	.
	Vermont	.	.	.	.
	Virginia	.	.	0.1 - 5%	.
	Washington	vague/n.a.	.	0.1 - 5%	.
	West Virginia	5.1- 10%	.	0.1 - 5%	.
	Wisconsin	.	.	vague/n.a.	15.1 - 20%
	Wyoming	5.1- 10%	.	0.1 - 5%	.

		1990 equity from developer preference	1990 equity from developer set-aside	2001 equity from developer preference	2001 equity from developer set-aside
STATE	Alabama	QAP not available	QAP not available	5.1- 10%	.
	Alaska	.	.	5.1- 10%	.
	Arizona	.	.	.	.
	Arkansas	QAP not available	QAP not available	.	.
	California	QAP not available	QAP not available	.	.
	Chicago	.	.	.	.
	Colorado	.	.	.	.
	Connecticut	.	.	0.1 - 5%	.
	Delaware	.	.	.	.
	Florida	.	.	.	.
	Georgia	.	.	.	.
	Hawaii	.	.	.	.
	Idaho	.	.	.	.
	Illinois	.	.	.	.
	Indiana	.	.	0.1 - 5%	.
	Iowa	.	.	15.1 - 20%	.
	Kansas	.	.	.	.
	Kentucky	.	.	.	.
	Louisiana	.	.	.	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	.	.	0.1 - 5%	.
	Massachusetts	vague/n.a.	.	.	.
	Michigan	.	.	.	.
	Minnesota	.	.	.	.
	Mississippi	.	.	.	.
	Missouri	.	.	.	.
	Montana	.	.	.	.
	Nebraska	.	.	.	.
	Nevada	.	.	.	.
	New Hampshire	.	.	.	.
	New Jersey	.	.	.	.
	New Mexico	.	.	.	.
	New York	.	.	.	.
	North Carolina	.	.	.	.
	North Dakota	.	.	.	.
	Ohio	.	.	.	.
	Oklahoma	.	.	15.1 - 20%	.
	Oregon	.	.	.	.
	Pennsylvania	.	.	vague/n.a.	.
	Rhode Island	.	.	vague/n.a.	.
	South Carolina	.	.	.	.
	South Dakota	.	.	0.1 - 5%	.
	Tennessee	.	.	.	.
	Texas	.	.	.	.
	Utah	.	.	vague/n.a.	.
	Vermont	.	.	.	.
	Virginia	.	.	.	.
	Washington	.	.	.	.
	West Virginia	0.1 - 5%	.	0.1 - 5%	.
	Wisconsin	.	.	.	.
	Wyoming	.	.	5.1- 10%	.

		1990 other government funding preference	1990 other government funding set-aside	2001 other government funding preference	2001 other government funding set-aside
STATE	Alabama	QAP not available	QAP not available	5.1- 10%	.
	Alaska	.	.	vague/n.a.	5.1- 10%
	Arizona	.	.	vague/n.a.	.
	Arkansas	QAP not available	QAP not available	vague/n.a.	15.1 - 20%
	California	QAP not available	QAP not available	vague/n.a.	.
	Chicago	vague/n.a.	.	vague/n.a.	.
	Colorado	0.1 - 5%	.	vague/n.a.	10.1 - 15%
	Connecticut	0.1 - 5%	.	0.1 - 5%	.
	Delaware	vague/n.a.	5.1- 10%	value not recorded in database	5.1- 10%
	Florida	vague/n.a.	.	vague/n.a.	vague/n.a.
	Georgia	vague/n.a.	10.1 - 15%	0.1 - 5%	.
	Hawaii	5.1- 10%	.	5.1- 10%	.
	Idaho	vague/n.a.	5.1- 10%	0.1 - 5%	.
	Illinois	vague/n.a.	.	.	.
	Indiana	.	.	0.1 - 5%	.
	Iowa	5.1- 10%	.	15.1 - 20%	.
	Kansas	0.1 - 5%	.	.	.
	Kentucky	5.1- 10%	.	vague/n.a.	0.1 - 5%
	Louisiana	.	.	vague/n.a.	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	.	.	0.1 - 5%	.
	Massachusetts	vague/n.a.	25.1 - 30%	.	.
	Michigan	5.1- 10%	5.1- 10%	0.1 - 5%	.
	Minnesota	5.1- 10%	.	5.1- 10%	.
	Mississippi	.	.	.	.
	Missouri	vague/n.a.	5.1- 10%	vague/n.a.	0.1 - 5%
	Montana	.	.	15.1 - 20%	.
	Nebraska	vague/n.a.	10.1 - 15%	vague/n.a.	.
	Nevada	20.1 - 25%	.	0.1 - 5%	5.1- 10%
	New Hampshire	vague/n.a.	.	5.1- 10%	.
	New Jersey	.	.	0.1 - 5%	value not recorded in database
	New Mexico	5.1- 10%	25.1 - 30%	5.1- 10%	5.1- 10%
	New York	10.1 - 15%	.	15.1 - 20%	.
	North Carolina	.	.	5.1- 10%	.
	North Dakota	.	.	5.1- 10%	.
	Ohio	0.1 - 5%	.	0.1 - 5%	.
	Oklahoma	0.1 - 5%	5.1- 10%	15.1 - 20%	5.1- 10%
	Oregon	vague/n.a.	5.1- 10%	vague/n.a.	10.1 - 15%
	Pennsylvania	vague/n.a.	.	vague/n.a.	0.1 - 5%
	Rhode Island	vague/n.a.	.	vague/n.a.	.
	South Carolina	5.1- 10%	.	15.1 - 20%	0.1 - 5%
	South Dakota	5.1- 10%	.	0.1 - 5%	.
	Tennessee	0.1 - 5%	.	10.1 - 15%	.
	Texas	vague/n.a.	.	0.1 - 5%	.
	Utah	0.1 - 5%	25.1 - 30%	0.1 - 5%	.
	Vermont	value not recorded in database	.	.	.
	Virginia	vague/n.a.	15.1 - 20%	0.1 - 5%	15.1 - 20%
	Washington	0.1 - 5%	vague/n.a.	0.1 - 5%	.
	West Virginia	vague/n.a.	40.1 - 45%	0.1 - 5%	.
	Wisconsin	0.1 - 5%	.	5.1- 10%	.
	Wyoming	0.1 - 5%	.	5.1- 10%	.

		1990 special needs preference	1990 special needs set-aside	2001 special needs preference	2001 special needs set-aside
STATE	Alabama	QAP not available	QAP not available	0.1 - 5%	.
	Alaska	5.1- 10%	.	5.1- 10%	.
	Arizona	0.1 - 5%	.	0.1 - 5%	vague/n.a.
	Arkansas	QAP not available	QAP not available	10.1 - 15%	.
	California	QAP not available	QAP not available	5.1- 10%	.
	Chicago	vague/n.a.	.	vague/n.a.	.
	Colorado	5.1- 10%	.	vague/n.a.	.
	Connecticut	vague/n.a.	.	0.1 - 5%	.
	Delaware	.	.	vague/n.a.	.
	Florida	.	.	.	.
	Georgia	0.1 - 5%	.	threshold	.
	Hawaii	5.1- 10%	.	0.1 - 5%	.
	Idaho	5.1- 10%	.	0.1 - 5%	.
	Illinois	vague/n.a.	5.1- 10%	0.1 - 5%	.
	Indiana	information not available	5.1- 10%	0.1 - 5%	5.1- 10%
	Iowa	0.1 - 5%	.	0.1 - 5%	.
	Kansas	5.1- 10%	.	0.1 - 5%	.
	Kentucky	0.1 - 5%	.	0.1 - 5%	.
	Louisiana	5.1- 10%	.	5.1- 10%	.
	Maine	QAP not available	QAP not available	0.1 - 5%	.
	Maryland	15.1 - 20%	.	0.1 - 5%	.
	Massachusetts	vague/n.a.	20.1 - 25%	0.1 - 5%	.
	Michigan	5.1- 10%	.	5.1- 10%	.
	Minnesota	5.1- 10%	.	5.1- 10%	.
	Mississippi	0.1 - 5%	.	.	.
	Missouri	vague/n.a.	.	vague/n.a.	.
	Montana	10.1 - 15%	.	5.1- 10%	.
	Nebraska	5.1- 10%	.	vague/n.a.	.
	Nevada	5.1- 10%	.	10.1 - 15%	.
	New Hampshire	5.1- 10%	.	5.1- 10%	.
	New Jersey	vague/n.a.	.	vague/n.a.	0.1 - 5%
	New Mexico	.	.	5.1- 10%	.
	New York	10.1 - 15%	.	0.1 - 5%	.
	North Carolina	.	.	0.1 - 5%	.
	North Dakota	.	.	5.1- 10%	.
	Ohio	5.1- 10%	.	0.1 - 5%	.
	Oklahoma	5.1- 10%	.	5.1- 10%	.
	Oregon	15.1 - 20%	.	vague/n.a.	.
	Pennsylvania	.	.	vague/n.a.	.
	Rhode Island	vague/n.a.	.	.	.
	South Carolina	0.1 - 5%	5.1- 10%	vague/n.a.	.
	South Dakota	5.1- 10%	.	0.1 - 5%	.
	Tennessee	0.1 - 5%	.	.	.
	Texas	.	.	10.1 - 15%	.
	Utah	10.1 - 15%	.	0.1 - 5%	.
	Vermont	vague/n.a.	.	vague/n.a.	.
	Virginia	0.1 - 5%	.	0.1 - 5%	.
	Washington	10.1 - 15%	.	0.1 - 5%	.
	West Virginia	5.1- 10%	.	0.1 - 5%	.
	Wisconsin	5.1- 10%	.	0.1 - 5%	.
	Wyoming	5.1- 10%	.	0.1 - 5%	.

		1990 very-low income preference	1990 very-low income set-aside	2001 very-low income preference	2001 very-low income set-aside
STATE	Alabama	QAP not available	QAP not available	15.1 - 20%	.
	Alaska	10.1 - 15%	.	5.1- 10%	.
	Arizona	45.1 - 50%	.	15.1 - 20%	.
	Arkansas	QAP not available	QAP not available	vague/n.a.	.
	California	QAP not available	QAP not available	30.1 - 35%	.
	Chicago	vague/n.a.	.	vague/n.a.	.
	Colorado	20.1 - 25%	.	vague/n.a.	.
	Connecticut	.	.	5.1- 10%	.
	Delaware	vague/n.a.	.	vague/n.a.	.
	Florida	vague/n.a.	.	vague/n.a.	.
	Georgia	.	.	.	.
	Hawaii	5.1- 10%	.	5.1- 10%	.
	Idaho	5.1- 10%	.	.	.
	Illinois	vague/n.a.	vague/n.a.	0.1 - 5%	.
	Indiana	vague/n.a.	.	0.1 - 5%	5.1- 10%
	Iowa	5.1- 10%	.	5.1- 10%	.
	Kansas	0.1 - 5%	.	20.1 - 25%	.
	Kentucky	5.1- 10%	.	.	.
	Louisiana	5.1- 10%	.	0.1 - 5%	.
	Maine	QAP not available	QAP not available	25.1 - 30%	.
	Maryland	15.1 - 20%	.	5.1- 10%	.
	Massachusetts	.	.	0.1 - 5%	.
	Michigan	0.1 - 5%	.	10.1 - 15%	.
	Minnesota	10.1 - 15%	.	5.1- 10%	.
	Mississippi	10.1 - 15%	.	.	.
	Missouri	5.1- 10%	.	vague/n.a.	.
	Montana	.	.	15.1 - 20%	.
	Nebraska	5.1- 10%	.	vague/n.a.	.
	Nevada	35.1 - 40%	.	5.1- 10%	.
	New Hampshire	10.1 - 15%	.	5.1- 10%	.
	New Jersey	.	.	.	.
	New Mexico	5.1- 10%	.	40.1 - 45%	.
	New York	5.1- 10%	.	0.1 - 5%	.
	North Carolina	.	.	0.1 - 5%	.
	North Dakota	5.1- 10%	.	10.1 - 15%	.
	Ohio	35.1 - 40%	.	0.1 - 5%	.
	Oklahoma	5.1- 10%	.	5.1- 10%	.
	Oregon	.	.	vague/n.a.	.
	Pennsylvania	.	.	vague/n.a.	.
	Rhode Island	vague/n.a.	.	vague/n.a.	.
	South Carolina	20.1 - 25%	.	5.1- 10%	.
	South Dakota	0.1 - 5%	.	0.1 - 5%	.
	Tennessee	20.1 - 25%	.	15.1 - 20%	.
	Texas	.	.	.	.
	Utah	20.1 - 25%	.	35.1 - 40%	.
	Vermont	vague/n.a.	.	vague/n.a.	.
	Virginia	.	.	0.1 - 5%	.
	Washington	.	.	15.1 - 20%	.
	West Virginia	0.1 - 5%	.	5.1- 10%	.
	Wisconsin	10.1 - 15%	.	10.1 - 15%	.
	Wyoming	.	.	0.1 - 5%	.

		1990 homeless preference	1990 homeless set-aside	2001 homeless preference	2001 homeless set-aside
STATE	Alabama	QAP not available	QAP not available	.	.
	Alaska	value not recorded in database	.	.	.
	Arizona	0.1 - 5%	.	vague/n.a.	.
	Arkansas	QAP not available	QAP not available	10.1 - 15%	.
	California	QAP not available	QAP not available	vague/n.a.	0.1 - 5%
	Chicago	vague/n.a.	.	vague/n.a.	.
	Colorado	5.1- 10%	.	vague/n.a.	.
	Connecticut	.	.	vague/n.a.	.
	Delaware	vague/n.a.	.	vague/n.a.	.
	Florida	.	.	.	.
	Georgia	0.1 - 5%	.	.	.
	Hawaii	5.1- 10%	.	.	.
	Idaho	5.1- 10%	.	.	.
	Illinois	.	.	0.1 - 5%	.
	Indiana	information not available	.	0.1 - 5%	.
	Iowa	0.1 - 5%	.	vague/n.a.	5.1- 10%
	Kansas	5.1- 10%	.	0.1 - 5%	.
	Kentucky	0.1 - 5%	.	0.1 - 5%	.
	Louisiana	5.1- 10%	.	0.1 - 5%	.
	Maine	QAP not available	QAP not available	0.1 - 5%	.
	Maryland	15.1 - 20%	.	0.1 - 5%	.
	Massachusetts	vague/n.a.	20.1 - 25%	0.1 - 5%	.
	Michigan	5.1- 10%	.	0.1 - 5%	.
	Minnesota	0.1 - 5%	.	5.1- 10%	.
	Mississippi	0.1 - 5%	.	.	.
	Missouri	vague/n.a.	0.1 - 5%	.	.
	Montana	.	.	.	.
	Nebraska	.	.	vague/n.a.	.
	Nevada	5.1- 10%	.	.	.
	New Hampshire	5.1- 10%	.	5.1- 10%	.
	New Jersey	vague/n.a.	.	5.1- 10%	.
	New Mexico	0.1 - 5%	.	.	.
	New York	10.1 - 15%	.	.	.
	North Carolina	.	.	0.1 - 5%	.
	North Dakota	.	.	5.1- 10%	.
	Ohio	5.1- 10%	.	.	.
	Oklahoma	.	.	.	.
	Oregon	15.1 - 20%	.	.	.
	Pennsylvania	value not recorded in database	.	value not recorded in database	.
	Rhode Island	.	.	.	.
	South Carolina	0.1 - 5%	.	0.1 - 5%	.
	South Dakota	0.1 - 5%	.	0.1 - 5%	.
	Tennessee	0.1 - 5%	.	0.1 - 5%	.
	Texas	vague/n.a.	.	10.1 - 15%	.
	Utah	10.1 - 15%	.	0.1 - 5%	.
	Vermont	vague/n.a.	.	vague/n.a.	.
	Virginia	0.1 - 5%	.	0.1 - 5%	.
	Washington	vague/n.a.	.	0.1 - 5%	.
	West Virginia	5.1- 10%	.	0.1 - 5%	.
	Wisconsin	5.1- 10%	.	0.1 - 5%	.
	Wyoming	5.1- 10%	.	0.1 - 5%	.

		1990 public housing authority preference	1990 public housing authority set-aside	2001 public housing authority preference	2001 public housing authority set-aside
STATE	Alabama	QAP not available	QAP not available	0.1 - 5%	.
	Alaska	5.1- 10%	.	0.1 - 5%	.
	Arizona	0.1 - 5%	.	vague/n.a.	.
	Arkansas	QAP not available	QAP not available	0.1 - 5%	.
	California	QAP not available	QAP not available	.	.
	Chicago	vague/n.a.	.	vague/n.a.	.
	Colorado	0.1 - 5%	.	vague/n.a.	.
	Connecticut	10.1 - 15%	.	0.1 - 5%	.
	Delaware	vague/n.a.	.	vague/n.a.	.
	Florida	vague/n.a.	.	vague/n.a.	.
	Georgia	0.1 - 5%	.	5.1- 10%	.
	Hawaii	0.1 - 5%	.	0.1 - 5%	.
	Idaho	5.1- 10%	.	0.1 - 5%	.
	Illinois	vague/n.a.	.	threshold	.
	Indiana	information not available	.	vague/n.a.	.
	Iowa	0.1 - 5%	.	0.1 - 5%	.
	Kansas	0.1 - 5%	.	0.1 - 5%	.
	Kentucky	0.1 - 5%	.	5.1- 10%	.
	Louisiana	5.1- 10%	.	0.1 - 5%	.
	Maine	QAP not available	QAP not available	0.1 - 5%	.
	Maryland	15.1 - 20%	.	0.1 - 5%	.
	Massachusetts	vague/n.a.	.	.	.
	Michigan	5.1- 10%	.	.	.
	Minnesota	threshold	.	15.1 - 20%	.
	Mississippi	0.1 - 5%	.	.	.
	Missouri	5.1- 10%	.	vague/n.a.	.
	Montana	0.1 - 5%	.	5.1- 10%	.
	Nebraska	0.1 - 5%	.	vague/n.a.	.
	Nevada	35.1 - 40%	.	.	.
	New Hampshire	5.1- 10%	.	0.1 - 5%	.
	New Jersey	vague/n.a.	.	0.1 - 5%	.
	New Mexico	5.1- 10%	.	0.1 - 5%	.
	New York	5.1- 10%	.	0.1 - 5%	.
	North Carolina	.	.	0.1 - 5%	.
	North Dakota	5.1- 10%	.	.	.
	Ohio	0.1 - 5%	.	0.1 - 5%	.
	Oklahoma	0.1 - 5%	.	0.1 - 5%	.
	Oregon	5.1- 10%	.	.	.
	Pennsylvania	vague/n.a.	.	vague/n.a.	.
	Rhode Island	vague/n.a.	.	vague/n.a.	.
	South Carolina	5.1- 10%	.	0.1 - 5%	.
	South Dakota	.	.	.	.
	Tennessee	0.1 - 5%	.	0.1 - 5%	5.1- 10%
	Texas	vague/n.a.	.	vague/n.a.	.
	Utah	10.1 - 15%	.	0.1 - 5%	.
	Vermont	vague/n.a.	.	vague/n.a.	.
	Virginia	0.1 - 5%	.	0.1 - 5%	.
	Washington	0.1 - 5%	.	.	.
	West Virginia	5.1- 10%	.	0.1 - 5%	.
	Wisconsin	5.1- 10%	.	.	.
	Wyoming	.	.	0.1 - 5%	.

		1990 large family preference	1990 large family set-aside	2001 large family preference	2001 large family set-aside
STATE	Alabama	QAP not available	QAP not available	0.1 - 5%	.
	Alaska	10.1 - 15%	.	5.1- 10%	.
	Arizona	0.1 - 5%	.	0.1 - 5%	.
	Arkansas	QAP not available	QAP not available	10.1 - 15%	.
	California	QAP not available	QAP not available	5.1- 10%	.
	Chicago	.	.	vague/n.a.	.
	Colorado	5.1- 10%	.	vague/n.a.	.
	Connecticut	10.1 - 15%	.	5.1- 10%	.
	Delaware	vague/n.a.	.	vague/n.a.	.
	Florida	vague/n.a.	.	vague/n.a.	.
	Georgia	0.1 - 5%	.	.	.
	Hawaii	5.1- 10%	.	0.1 - 5%	.
	Idaho	.	.	0.1 - 5%	.
	Illinois	.	.	5.1- 10%	.
	Indiana	vague/n.a.	.	.	.
	Iowa	0.1 - 5%	.	5.1- 10%	.
	Kansas	0.1 - 5%	.	0.1 - 5%	.
	Kentucky	5.1- 10%	.	0.1 - 5%	.
	Louisiana	5.1- 10%	.	5.1- 10%	.
	Maine	QAP not available	QAP not available	5.1- 10%	.
	Maryland	.	.	0.1 - 5%	.
	Massachusetts	.	35.1 - 40%	0.1 - 5%	.
	Michigan	5.1- 10%	.	.	.
	Minnesota	threshold	.	5.1- 10%	.
	Mississippi	5.1- 10%	.	.	.
	Missouri	5.1- 10%	.	vague/n.a.	.
	Montana	10.1 - 15%	.	5.1- 10%	.
	Nebraska	5.1- 10%	.	vague/n.a.	.
	Nevada	5.1- 10%	.	0.1 - 5%	.
	New Hampshire	10.1 - 15%	.	5.1- 10%	.
	New Jersey	vague/n.a.	.	5.1- 10%	.
	New Mexico	5.1- 10%	.	.	.
	New York	10.1 - 15%	.	0.1 - 5%	.
	North Carolina	.	.	vague/n.a.	.
	North Dakota	15.1 - 20%	.	0.1 - 5%	.
	Ohio	35.1 - 40%	.	0.1 - 5%	.
	Oklahoma	.	.	.	.
	Oregon	15.1 - 20%	.	vague/n.a.	.
	Pennsylvania	vague/n.a.	.	.	.
	Rhode Island	vague/n.a.	.	.	.
	South Carolina	0.1 - 5%	.	5.1- 10%	.
	South Dakota	0.1 - 5%	.	0.1 - 5%	.
	Tennessee	.	.	0.1 - 5%	.
	Texas	vague/n.a.	.	0.1 - 5%	.
	Utah	10.1 - 15%	.	0.1 - 5%	.
	Vermont	vague/n.a.	.	vague/n.a.	.
	Virginia	0.1 - 5%	.	0.1 - 5%	.
	Washington	vague/n.a.	.	0.1 - 5%	.
	West Virginia	5.1- 10%	.	0.1 - 5%	.
	Wisconsin	.	.	0.1 - 5%	.
	Wyoming	.	.	0.1 - 5%	.

		1990 elderly preference	1990 elderly set-aside	2001 elderly preference	2001 elderly set-aside
STATE	Alabama	QAP not available	QAP not available	0.1 - 5%	.
	Alaska	5.1- 10%	.	5.1- 10%	.
	Arizona	0.1 - 5%	.	5.1- 10%	.
	Arkansas	QAP not available	QAP not available	10.1 - 15%	5.1- 10%
	California	QAP not available	QAP not available	5.1- 10%	.
	Chicago	.	.	vague/n.a.	.
	Colorado	5.1- 10%	.	vague/n.a.	.
	Connecticut	.	.	.	.
	Delaware	vague/n.a.	.	vague/n.a.	.
	Florida	.	.	vague/n.a.	.
	Georgia	0.1 - 5%	.	0.1 - 5%	.
	Hawaii	5.1- 10%	.	.	.
	Idaho	5.1- 10%	.	0.1 - 5%	.
	Illinois	.	.	5.1- 10%	.
	Indiana	information not available	.	vague/n.a.	5.1- 10%
	Iowa	0.1 - 5%	.	vague/n.a.	5.1- 10%
	Kansas	0.1 - 5%	.	0.1 - 5%	.
	Kentucky	5.1- 10%	.	5.1- 10%	.
	Louisiana	5.1- 10%	.	5.1- 10%	.
	Maine	QAP not available	QAP not available	25.1 - 30%	10.1 - 15%
	Maryland	.	.	.	.
	Massachusetts	vague/n.a.	20.1 - 25%	0.1 - 5%	.
	Michigan	0.1 - 5%	5.1- 10%	0.1 - 5%	5.1- 10%
	Minnesota	.	.	.	.
	Mississippi	0.1 - 5%	.	.	.
	Missouri	5.1- 10%	.	vague/n.a.	.
	Montana	10.1 - 15%	.	5.1- 10%	.
	Nebraska	.	.	vague/n.a.	.
	Nevada	5.1- 10%	.	10.1 - 15%	.
	New Hampshire	.	.	5.1- 10%	.
	New Jersey	vague/n.a.	.	vague/n.a.	10.1 - 15%
	New Mexico	0.1 - 5%	.	5.1- 10%	.
	New York	.	.	.	.
	North Carolina	.	.	0.1 - 5%	.
	North Dakota	.	.	.	.
	Ohio	5.1- 10%	.	0.1 - 5%	.
	Oklahoma	5.1- 10%	.	0.1 - 5%	.
	Oregon	.	.	.	.
	Pennsylvania	vague/n.a.	.	vague/n.a.	.
	Rhode Island	.	.	.	.
	South Carolina	0.1 - 5%	5.1- 10%	0.1 - 5%	.
	South Dakota	0.1 - 5%	.	0.1 - 5%	.
	Tennessee	0.1 - 5%	.	0.1 - 5%	.
	Texas	vague/n.a.	.	0.1 - 5%	5.1- 10%
	Utah	10.1 - 15%	.	0.1 - 5%	.
	Vermont	.	.	.	.
	Virginia	0.1 - 5%	.	0.1 - 5%	.
	Washington	vague/n.a.	.	0.1 - 5%	.
	West Virginia	5.1- 10%	.	0.1 - 5%	.
	Wisconsin	5.1- 10%	.	0.1 - 5%	.
	Wyoming	5.1- 10%	.	0.1 - 5%	.

		1990 minority preference	1990 minority set-aside	2001 minority preference	2001 minority set-aside
STATE	Alabama	QAP not available	QAP not available	.	.
	Alaska	.	.	.	.
	Arizona	.	.	.	.
	Arkansas	QAP not available	QAP not available	.	.
	California	QAP not available	QAP not available	.	.
	Chicago	.	.	.	.
	Colorado	.	.	.	.
	Connecticut	.	.	.	.
	Delaware	.	.	.	.
	Florida	.	.	.	.
	Georgia	.	.	.	.
	Hawaii	.	.	.	.
	Idaho	.	.	.	.
	Illinois	.	.	.	.
	Indiana	.	.	.	.
	Iowa	.	.	.	.
	Kansas	.	.	.	.
	Kentucky	.	.	.	.
	Louisiana	.	.	.	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	.	.	.	.
	Massachusetts	vague/n.a.	.	.	.
	Michigan	.	.	.	.
	Minnesota	.	.	.	.
	Mississippi	.	.	.	.
	Missouri	.	.	.	.
	Montana	.	.	.	.
	Nebraska	.	.	.	.
	Nevada	.	.	.	.
	New Hampshire	.	.	.	.
	New Jersey	.	.	.	.
	New Mexico	.	.	5.1- 10%	.
	New York	10.1 - 15%	.	.	.
	North Carolina	.	.	.	.
	North Dakota	.	.	vague/n.a.	5.1- 10%
	Ohio	10.1 - 15%	.	.	.
	Oklahoma	.	.	.	.
	Oregon	.	.	.	.
	Pennsylvania	.	.	.	.
	Rhode Island	.	.	.	.
	South Carolina	.	.	.	.
	South Dakota	.	.	.	.
	Tennessee	.	.	.	.
	Texas	.	.	.	.
	Utah	.	.	.	.
	Vermont	.	.	.	.
	Virginia	.	.	.	.
	Washington	.	.	.	.

		1990 at-risk preference	1990 at-risk set-aside	2001 at-risk preference	2001 at-risk set-aside
STATE	Alabama	QAP not available	QAP not available	0.1 - 5%	.
	Alaska	.	.	.	.
	Arizona	0.1 - 5%	.	.	.
	Arkansas	QAP not available	QAP not available	.	.
	California	QAP not available	QAP not available	vague/n.a.	5.1- 10%
	Chicago	vague/n.a.	.	vague/n.a.	.
	Colorado	.	.	.	.
	Connecticut	vague/n.a.	.	vague/n.a.	.
	Delaware	.	.	.	.
	Florida	.	.	.	.
	Georgia	0.1 - 5%	.	.	.
	Hawaii	.	.	.	.
	Idaho	5.1- 10%	.	0.1 - 5%	.
	Illinois	.	.	vague/n.a.	15.1 - 20%
	Indiana	.	.	0.1 - 5%	5.1- 10%
	Iowa	5.1- 10%	.	0.1 - 5%	.
	Kansas	0.1 - 5%	.	0.1 - 5%	.
	Kentucky	.	.	0.1 - 5%	.
	Louisiana	.	.	.	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	15.1 - 20%	.	.	.
	Massachusetts	vague/n.a.	30.1 - 35%	vague/n.a.	55.1 - 60%
	Michigan	0.1 - 5%	.	0.1 - 5%	.
	Minnesota	0.1 - 5%	.	10.1 - 15%	.
	Mississippi	0.1 - 5%	.	.	.
	Missouri	5.1- 10%	.	.	.
	Montana	.	.	.	.
	Nebraska	5.1- 10%	.	.	.
	Nevada	35.1 - 40%	.	.	.
	New Hampshire	0.1 - 5%	.	.	.
	New Jersey	.	.	.	.
	New Mexico	.	.	5.1- 10%	.
	New York	10.1 - 15%	.	.	.
	North Carolina	.	.	0.1 - 5%	.
	North Dakota	5.1- 10%	.	0.1 - 5%	.
	Ohio	.	.	0.1 - 5%	.
	Oklahoma	0.1 - 5%	.	.	.
	Oregon	5.1- 10%	.	vague/n.a.	5.1- 10%
	Pennsylvania	.	.	vague/n.a.	5.1- 10%
	Rhode Island	vague/n.a.	.	.	.
	South Carolina	0.1 - 5%	.	.	.
	South Dakota	.	.	.	.
	Tennessee	.	.	5.1- 10%	.
	Texas	.	.	vague/n.a.	5.1- 10%
	Utah	5.1- 10%	.	0.1 - 5%	.
	Vermont	vague/n.a.	.	vague/n.a.	.
	Virginia	.	.	vague/n.a.	.
	Washington	vague/n.a.	0.1 - 5%	0.1 - 5%	.
	West Virginia	.	.	0.1 - 5%	15.1 - 20%
	Wisconsin	5.1- 10%	.	vague/n.a.	15.1 - 20%
	Wyoming	0.1 - 5%	.	.	.

		1990 rehabilitation preference	1990 rehabilitation set-aside	2001 rehabilitation preference	2001 rehabilitation set-aside
STATE	Alabama	QAP not available	QAP not available	0.1 - 5%	.
	Alaska	5.1- 10%	.	0.1 - 5%	.
	Arizona	.	.	10.1 - 15%	vague/n.a.
	Arkansas	QAP not available	QAP not available	5.1- 10%	.
	California	QAP not available	QAP not available	.	.
	Chicago	vague/n.a.	.	vague/n.a.	.
	Colorado	.	.	vague/n.a.	.
	Connecticut	.	.	5.1- 10%	.
	Delaware	.	.	.	.
	Florida	.	.	.	.
	Georgia	.	.	.	.
	Hawaii	.	.	.	.
	Idaho	.	.	.	.
	Illinois	.	.	0.1 - 5%	.
	Indiana	.	.	0.1 - 5%	5.1- 10%
	Iowa	5.1- 10%	.	0.1 - 5%	.
	Kansas	.	.	.	.
	Kentucky	0.1 - 5%	.	.	.
	Louisiana	.	.	vague/n.a.	10.1 - 15%
	Maine	QAP not available	QAP not available	0.1 - 5%	.
	Maryland	.	.	0.1 - 5%	.
	Massachusetts	.	.	.	.
	Michigan	.	.	.	.
	Minnesota	0.1 - 5%	.	10.1 - 15%	.
	Mississippi	.	.	.	.
	Missouri	.	.	.	.
	Montana	.	.	.	.
	Nebraska	5.1- 10%	.	.	.
	Nevada	.	.	0.1 - 5%	.
	New Hampshire	.	.	.	.
	New Jersey	.	.	.	.
	New Mexico	.	.	5.1- 10%	.
	New York	.	.	0.1 - 5%	.
	North Carolina	.	.	.	.
	North Dakota	5.1- 10%	.	5.1- 10%	.
	Ohio	.	.	vague/n.a.	.
	Oklahoma	.	.	.	.
	Oregon	.	.	.	.
	Pennsylvania	.	.	.	.
	Rhode Island	.	.	.	.
	South Carolina	vague/n.a.	.	.	.
	South Dakota	0.1 - 5%	.	vague/n.a.	55.1 - 60%
	Tennessee	.	.	.	.
	Texas	.	.	.	.
	Utah	.	.	0.1 - 5%	.
	Vermont	.	.	.	.
	Virginia	.	.	.	.
	Washington	5.1- 10%	.	0.1 - 5%	.
	West Virginia	vague/n.a.	5.1- 10%	.	.
	Wisconsin	5.1- 10%	.	5.1- 10%	.
	Wyoming	.	.	.	.

		1990 new construction preference	1990 new construction set-aside	2001 new construction preference	2001 new construction set-aside
STATE	Alabama	QAP not available	QAP not available	.	.
	Alaska	.	.	.	.
	Arizona	.	.	.	.
	Arkansas	QAP not available	QAP not available	.	.
	California	QAP not available	QAP not available	.	.
	Chicago	.	.	.	.
	Colorado	.	.	.	.
	Connecticut	0.1 - 5%	.	5.1- 10%	.
	Delaware	.	.	.	.
	Florida	.	.	.	.
	Georgia	0.1 - 5%	.	.	.
	Hawaii	.	.	.	.
	Idaho	.	.	.	.
	Illinois	.	.	.	.
	Indiana	.	.	.	.
	Iowa	0.1 - 5%	.	.	.
	Kansas	.	.	.	.
	Kentucky	.	.	.	.
	Louisiana	5.1- 10%	.	0.1 - 5%	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	.	.	.	.
	Massachusetts	.	.	.	.
	Michigan	.	.	.	.
	Minnesota	.	.	.	.
	Mississippi	.	.	.	.
	Missouri	.	.	.	.
	Montana	.	.	.	.
	Nebraska	.	.	.	.
	Nevada	.	.	.	.
	New Hampshire	10.1 - 15%	.	.	.
	New Jersey	.	.	.	.
	New Mexico	.	.	.	.
	New York	.	.	.	.
	North Carolina	.	.	.	.
	North Dakota	.	.	.	.
	Ohio	.	.	.	.
	Oklahoma	0.1 - 5%	.	.	.
	Oregon	.	.	.	.
	Pennsylvania	.	.	.	.
	Rhode Island	.	.	.	.
	South Carolina	.	.	.	.
	South Dakota	.	.	.	35.1 - 40%
	Tennessee	.	.	10.1 - 15%	.
	Texas	.	.	.	.
	Utah	.	.	.	.
	Vermont	.	.	.	.
	Virginia	.	.	.	.
	Washington	.	.	.	.
	West Virginia	vague/n.a.	30.1 - 35%	0.1 - 5%	15.1 - 20%
	Wisconsin	.	.	.	.
	Wyoming	.	.	.	.

		1990 mixed-use preference	1990 mixed-use set-aside	2001 mixed-use preference	2001 mixed-use set-aside
STATE	Alabama	QAP not available	QAP not available	.	.
	Alaska	.	.	.	.
	Arizona	.	.	.	.
	Arkansas	QAP not available	QAP not available	.	.
	California	QAP not available	QAP not available	.	.
	Chicago	.	.	.	.
	Colorado	.	.	.	.
	Connecticut	.	.	.	.
	Delaware	.	.	.	.
	Florida	.	.	.	.
	Georgia	.	.	.	.
	Hawaii	.	.	.	.
	Idaho	.	.	.	.
	Illinois	.	.	.	.
	Indiana	.	.	.	.
	Iowa	.	.	.	.
	Kansas	.	.	.	.
	Kentucky	.	.	.	.
	Louisiana	.	.	.	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	.	.	.	.
	Massachusetts	.	.	.	.
	Michigan	.	.	.	.
	Minnesota	.	.	.	.
	Mississippi	.	.	.	.
	Missouri	.	.	.	.
	Montana	.	.	.	.
	Nebraska	.	.	.	.
	Nevada	.	.	0.1 - 5%	.
	New Hampshire	.	.	.	.
	New Jersey	.	.	.	.
	New Mexico	.	.	.	.
	New York	.	.	.	.
	North Carolina	.	.	.	.
	North Dakota	.	.	.	.
	Ohio	.	.	.	.
	Oklahoma	.	.	.	.
	Oregon	.	.	vague/n.a.	.
	Pennsylvania	.	.	.	.
	Rhode Island	.	.	.	.
	South Carolina	.	.	.	.
	South Dakota	.	.	.	.
	Tennessee	.	.	.	.
	Texas	.	.	.	.
	Utah	.	.	0.1 - 5%	.
	Vermont	.	.	.	.
	Virginia	.	.	.	.
	Washington	.	.	.	.
	West Virginia	.	.	.	.
	Wisconsin	.	.	.	.
	Wyoming	.	.	.	.

		1990 unit size preference	1990 unit size set-aside	2001 unit size preference	2001 unit size set-aside
STATE	Alabama	QAP not available	QAP not available	0.1 - 5%	.
	Alaska	.	.	5.1- 10%	.
	Arizona	0.1 - 5%	.	0.1 - 5%	.
	Arkansas	QAP not available	QAP not available	.	.
	California	QAP not available	QAP not available	5.1- 10%	.
	Chicago	.	.	.	.
	Colorado	.	.	.	.
	Connecticut	.	.	.	.
	Delaware	vague/n.a.	.	vague/n.a.	.
	Florida	vague/n.a.	.	vague/n.a.	.
	Georgia	.	.	.	.
	Hawaii	5.1- 10%	.	0.1 - 5%	.
	Idaho	.	.	.	.
	Illinois	vague/n.a.	.	5.1- 10%	.
	Indiana	information not available	.	0.1 - 5%	.
	Iowa	0.1 - 5%	.	value not recorded in database	.
	Kansas	0.1 - 5%	.	0.1 - 5%	.
	Kentucky	5.1- 10%	.	0.1 - 5%	.
	Louisiana	5.1- 10%	.	threshold	.
	Maine	QAP not available	QAP not available	5.1- 10%	.
	Maryland	.	.	0.1 - 5%	.
	Massachusetts	.	.	threshold	.
	Michigan	0.1 - 5%	.	.	.
	Minnesota	5.1- 10%	.	5.1- 10%	.
	Mississippi	5.1- 10%	.	.	.
	Missouri	5.1- 10%	.	.	.
	Montana	10.1 - 15%	.	.	.
	Nebraska	5.1- 10%	.	vague/n.a.	.
	Nevada	35.1 - 40%	.	.	.
	New Hampshire	10.1 - 15%	.	5.1- 10%	.
	New Jersey	.	.	threshold	.
	New Mexico	5.1- 10%	.	.	.
	New York	.	.	.	.
	North Carolina	.	.	vague/n.a.	.
	North Dakota	15.1 - 20%	.	0.1 - 5%	.
	Ohio	35.1 - 40%	.	0.1 - 5%	.
	Oklahoma	.	.	.	.
	Oregon	15.1 - 20%	.	.	.
	Pennsylvania	vague/n.a.	.	.	.
	Rhode Island	.	.	.	.
	South Carolina	5.1- 10%	.	.	.
	South Dakota	0.1 - 5%	.	threshold	.
	Tennessee	.	.	.	.
	Texas	.	.	5.1- 10%	.
	Utah	5.1- 10%	.	0.1 - 5%	.
	Vermont	.	.	vague/n.a.	.
	Virginia	.	.	0.1 - 5%	.
	Washington	vague/n.a.	.	0.1 - 5%	.
	West Virginia	.	.	.	.
	Wisconsin	5.1- 10%	.	0.1 - 5%	.
	Wyoming	.	.	.	.

		1990 non-profit type preference	1990 non-profit type set-aside	2001 non-profit type preference	2001 non-profit type set-aside
STATE	Alabama	QAP not available	QAP not available	.	.
	Alaska	.	.	.	.
	Arizona	.	.	.	.
	Arkansas	QAP not available	QAP not available	.	.
	California	QAP not available	QAP not available	.	.
	Chicago	.	.	.	.
	Colorado	.	.	.	.
	Connecticut	.	.	.	.
	Delaware	.	.	.	.
	Florida	.	.	.	.
	Georgia	.	.	0.1 - 5%	.
	Hawaii	.	.	.	.
	Idaho	.	.	.	.
	Illinois	.	.	.	.
	Indiana	.	.	.	.
	Iowa	.	.	.	.
	Kansas	.	.	.	.
	Kentucky	.	.	.	.
	Louisiana	.	.	vague/n.a.	5.1- 10%
	Maine	QAP not available	QAP not available	.	.
	Maryland	15.1 - 20%	information not available	0.1 - 5%	5.1- 10%
	Massachusetts	.	.	.	.
	Michigan	.	.	0.1 - 5%	5.1- 10%
	Minnesota	.	.	0.1 - 5%	5.1- 10%
	Mississippi	.	.	.	.
	Missouri	.	.	.	.
	Montana	0.1 - 5%	5.1- 10%	0.1 - 5%	5.1- 10%
	Nebraska	.	.	.	.
	Nevada	20.1 - 25%	5.1- 10%	.	.
	New Hampshire	.	.	.	.
	New Jersey	.	.	.	.
	New Mexico	.	.	.	.
	New York	.	.	.	.
	North Carolina	.	.	.	.
	North Dakota	.	.	.	.
	Ohio	.	.	.	.
	Oklahoma	.	.	.	.
	Oregon	0.1 - 5%	5.1- 10%	.	.
	Pennsylvania	.	.	vague/n.a.	.
	Rhode Island	.	.	.	.
	South Carolina	.	.	0.1 - 5%	5.1- 10%
	South Dakota	.	.	.	.
	Tennessee	.	.	.	.
	Texas	.	.	.	.
	Utah	.	.	0.1 - 5%	5.1- 10%
	Vermont	.	.	.	.
	Virginia	.	10.1 - 15%	.	.
	Washington	.	.	vague/n.a.	10.1 - 15%
	West Virginia	0.1 - 5%	.	0.1 - 5%	.
	Wisconsin	.	5.1- 10%	vague/n.a.	5.1- 10%
	Wyoming	vague/n.a.	5.1- 10%	.	.

		1990 total units preference	1990 total units set-aside	2001 total units preference	2001 total units set-aside
STATE	Alabama	QAP not available	QAP not available	threshold	.
	Alaska	.	.	threshold	.
	Arizona	.	.	0.1 - 5%	.
	Arkansas	QAP not available	QAP not available	0.1 - 5%	.
	California	QAP not available	QAP not available	.	0.1 - 5%
	Chicago	.	.	vague/n.a.	.
	Colorado	vague/n.a.	.	.	.
	Connecticut	.	.	vague/n.a.	.
	Delaware	.	.	.	.
	Florida	.	.	vague/n.a.	.
	Georgia	0.1 - 5%	.	.	.
	Hawaii	5.1- 10%	.	.	.
	Idaho	.	.	0.1 - 5%	.
	Illinois	vague/n.a.	.	vague/n.a.	5.1- 10%
	Indiana	.	.	.	.
	Iowa	0.1 - 5%	.	.	.
	Kansas	0.1 - 5%	.	vague/n.a.	.
	Kentucky	5.1- 10%	.	0.1 - 5%	.
	Louisiana	.	.	.	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	.	.	0.1 - 5%	.
	Massachusetts	.	.	threshold	.
	Michigan	0.1 - 5%	.	vague/n.a.	.
	Minnesota	.	.	.	.
	Mississippi	.	.	.	.
	Missouri	vague/n.a.	5.1- 10%	.	.
	Montana	.	.	vague/n.a.	15.1 - 20%
	Nebraska	5.1- 10%	.	.	.
	Nevada	.	.	.	.
	New Hampshire	.	.	5.1- 10%	.
	New Jersey	.	.	vague/n.a.	.
	New Mexico	.	.	5.1- 10%	.
	New York	.	.	.	.
	North Carolina	.	.	5.1- 10%	.
	North Dakota	.	.	.	.
	Ohio	35.1 - 40%	.	.	.
	Oklahoma	0.1 - 5%	.	vague/n.a.	.
	Oregon	information not available	.	.	.
	Pennsylvania	vague/n.a.	.	.	.
	Rhode Island	.	.	.	.
	South Carolina	vague/n.a.	.	5.1- 10%	.
	South Dakota	0.1 - 5%	.	0.1 - 5%	.
	Tennessee	0.1 - 5%	.	vague/n.a.	5.1- 10%
	Texas	.	.	0.1 - 5%	.
	Utah	.	.	vague/n.a.	5.1- 10%
	Vermont	.	.	.	.
	Virginia	.	.	.	.
	Washington	5.1- 10%	.	0.1 - 5%	.
	West Virginia	vague/n.a.	5.1- 10%	0.1 - 5%	value not recorded in database
	Wisconsin	.	.	0.1 - 5%	.
	Wyoming	.	.	.	.

		1990 non-profit region preference	1990 non-profit region set-aside	2001 non-profit region preference	2001 non-profit region set-aside
STATE	Alabama	QAP not available	QAP not available	.	.
	Alaska	.	.	.	.
	Arizona	15.1 - 20%	.	.	.
	Arkansas	QAP not available	QAP not available	0.1 - 5%	15.1 - 20%
	California	QAP not available	QAP not available	.	.
	Chicago	.	.	.	.
	Colorado	0.1 - 5%	.	vague/n.a.	vague/n.a.
	Connecticut	.	.	0.1 - 5%	.
	Delaware	.	.	.	.
	Florida	vague/n.a.	.	.	.
	Georgia	0.1 - 5%	5.1- 10%	vague/n.a.	.
	Hawaii	5.1- 10%	vague/n.a.	0.1 - 5%	5.1- 10%
	Idaho	.	.	0.1 - 5%	15.1 - 20%
	Illinois	.	.	0.1 - 5%	5.1- 10%
	Indiana	vague/n.a.	.	.	.
	Iowa	0.1 - 5%	.	.	.
	Kansas	0.1 - 5%	.	0.1 - 5%	.
	Kentucky	.	.	.	.
	Louisiana	5.1- 10%	vague/n.a.	.	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	15.1 - 20%	information not available	0.1 - 5%	5.1- 10%
	Massachusetts	.	.	.	.
	Michigan	0.1 - 5%	5.1- 10%	0.1 - 5%	5.1- 10%
	Minnesota	0.1 - 5%	.	0.1 - 5%	5.1- 10%
	Mississippi	5.1- 10%	5.1- 10%	.	.
	Missouri	5.1- 10%	5.1- 10%	.	.
	Montana	0.1 - 5%	5.1- 10%	0.1 - 5%	5.1- 10%
	Nebraska	.	.	vague/n.a.	5.1- 10%
	Nevada	20.1 - 25%	5.1- 10%	.	.
	New Hampshire	5.1- 10%	.	5.1- 10%	5.1- 10%
	New Jersey	.	.	vague/n.a.	20.1 - 25%
	New Mexico	.	.	5.1- 10%	5.1- 10%
	New York	10.1 - 15%	5.1- 10%	0.1 - 5%	5.1- 10%
	North Carolina	.	.	vague/n.a.	5.1- 10%
	North Dakota	5.1- 10%	5.1- 10%	0.1 - 5%	5.1- 10%
	Ohio	0.1 - 5%	.	0.1 - 5%	value not recorded in database
	Oklahoma	.	.	.	.
	Oregon	.	.	vague/n.a.	5.1- 10%
	Pennsylvania	.	.	vague/n.a.	value not recorded in database
	Rhode Island	.	.	.	.
	South Carolina	0.1 - 5%	5.1- 10%	0.1 - 5%	5.1- 10%
	South Dakota	0.1 - 5%	.	.	.
	Tennessee	0.1 - 5%	5.1- 10%	0.1 - 5%	5.1- 10%
	Texas	.	.	.	.
	Utah	.	.	.	.
	Vermont	.	.	.	.
	Virginia	.	.	vague/n.a.	10.1 - 15%
	Washington	0.1 - 5%	5.1- 10%	.	.
	West Virginia	5.1- 10%	.	.	.
	Wisconsin	vague/n.a.	5.1- 10%	vague/n.a.	5.1- 10%
	Wyoming	vague/n.a.	5.1- 10%	0.1 - 5%	5.1- 10%

		1990 non-profit activity preference	1990 non-profit activity set-aside	2001 non-profit activity preference	2001 non-profit activity set-aside
STATE	Alabama	QAP not available	QAP not available	.	.
	Alaska	.	.	.	.
	Arizona	.	.	.	.
	Arkansas	QAP not available	QAP not available	.	.
	California	QAP not available	QAP not available	.	.
	Chicago	.	.	.	.
	Colorado	vague/n.a.	5.1- 10%	.	.
	Connecticut	.	.	.	.
	Delaware	.	.	.	.
	Florida	.	.	.	.
	Georgia	.	.	.	.
	Hawaii	.	.	.	.
	Idaho	.	.	.	.
	Illinois	.	.	.	.
	Indiana	.	.	.	.
	Iowa	.	.	.	.
	Kansas	.	.	.	.
	Kentucky	.	.	.	.
	Louisiana	.	.	.	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	.	.	.	.
	Massachusetts	.	.	.	.
	Michigan	.	.	0.1 - 5%	5.1- 10%
	Minnesota	.	.	.	.
	Mississippi	.	.	.	.
	Missouri	.	.	.	.
	Montana	.	.	.	.
	Nebraska	.	.	.	.
	Nevada	.	.	.	.
	New Hampshire	.	.	0.1 - 5%	.
	New Jersey	.	.	.	.
	New Mexico	.	.	.	.
	New York	.	.	.	.
	North Carolina	.	.	.	.
	North Dakota	.	.	.	.
	Ohio	.	.	0.1 - 5%	5.1- 10%
	Oklahoma	0.1 - 5%	.	.	.
	Oregon	.	.	.	.
	Pennsylvania	.	.	vague/n.a.	value not recorded in database
	Rhode Island	.	.	.	.
	South Carolina	.	.	.	.
	South Dakota	.	.	.	.
	Tennessee	.	.	.	.
	Texas	.	.	.	.
	Utah	.	.	.	.
	Vermont	.	.	.	.
	Virginia	.	.	.	.
	Washington	.	.	.	.
	West Virginia	.	.	.	.
	Wisconsin	.	.	vague/n.a.	5.1- 10%
	Wyoming	.	.	.	.

		1990 minority/women business preference	1990 minority/women business set-aside	2001 minority/women business preference	2001 minority/women business set-aside
STATE	Alabama	QAP not available	QAP not available	0.1 - 5%	.
	Alaska	.	.	.	.
	Arizona	.	.	.	.
	Arkansas	QAP not available	QAP not available	.	.
	California	QAP not available	QAP not available	.	.
	Chicago	.	.	.	.
	Colorado	0.1 - 5%	.	.	.
	Connecticut	5.1- 10%	.	0.1 - 5%	.
	Delaware	.	.	.	.
	Florida	.	.	.	.
	Georgia	0.1 - 5%	.	.	.
	Hawaii	.	.	.	.
	Idaho	.	.	.	.
	Illinois	.	.	0.1 - 5%	.
	Indiana	.	.	0.1 - 5%	.
	Iowa	.	.	0.1 - 5%	.
	Kansas	0.1 - 5%	.	.	.
	Kentucky	.	.	5.1- 10%	.
	Louisiana	5.1- 10%	.	.	.
	Maine	QAP not available	QAP not available	.	.
	Maryland	.	.	0.1 - 5%	.
	Massachusetts	.	.	0.1 - 5%	.
	Michigan	0.1 - 5%	.	.	.
	Minnesota	.	.	.	.
	Mississippi	5.1- 10%	.	.	.
	Missouri	.	.	.	.
	Montana	.	.	.	.
	Nebraska	.	.	.	.
	Nevada	20.1 - 25%	.	.	.
	New Hampshire	.	.	.	.
	New Jersey	.	.	0.1 - 5%	.
	New Mexico	.	.	.	.
	New York	10.1 - 15%	.	.	.
	North Carolina	.	.	.	.
	North Dakota	.	.	.	.
	Ohio	.	.	.	.
	Oklahoma	.	.	.	.
	Oregon	.	.	.	.
	Pennsylvania	vague/n.a.	.	vague/n.a.	.
	Rhode Island	.	.	vague/n.a.	.
	South Carolina	5.1- 10%	.	.	.
	South Dakota	5.1- 10%	.	0.1 - 5%	.
	Tennessee	.	.	.	.
	Texas	vague/n.a.	.	0.1 - 5%	.
	Utah	.	.	.	.
	Vermont	.	.	.	.
	Virginia	.	.	.	.
	Washington	.	.	.	.
	West Virginia	0.1 - 5%	.	0.1 - 5%	.
	Wisconsin	vague/n.a.	.	0.1 - 5%	.
	Wyoming	.	.	.	.

			1990 total project cost restrictions	2001 total project cost restrictions
STATE	Alabama	1	QAP not available	yes
	Alaska	1	.	.
	Arizona	1	.	yes
	Arkansas	1	QAP not available	.
	California	1	QAP not available	.
	Chicago	1	.	.
	Colorado	1	.	.
	Connecticut	1	.	.
	Delaware	1	.	.
	Florida	1	.	.
	Georgia	1	.	.
	Hawaii	1	.	.
	Idaho	1	.	.
	Illinois	1	.	.
	Indiana	1	.	.
	Iowa	1	.	.
	Kansas	1	.	.
	Kentucky	1	.	.
	Louisiana	1	.	yes
	Maine	1	QAP not available	.
	Maryland	1	.	.
	Massachusetts	1	.	yes
	Michigan	1	.	.
	Minnesota	1	.	yes
	Mississippi	1	.	.
	Missouri	1	.	.
	Montana	1	.	.
	Nebraska	1	.	yes
	Nevada	1	yes	.
	New Hampshire	1	.	yes
	New Jersey	1	.	.
	New Mexico	1	.	yes
	New York	1	.	yes
	North Carolina	1	yes	.
	North Dakota	1	yes	.
	Ohio	1	yes	yes
	Oklahoma	1	.	.
	Oregon	1	.	yes
	Pennsylvania	1	.	yes
	Rhode Island	1	.	yes
	South Carolina	1	.	.
	South Dakota	1	.	.
	Tennessee	1	.	.
	Texas	1	.	.
	Utah	1	.	yes
	Vermont	1	.	yes
	Virginia	1	.	yes

			1990 per-unit cost restictions	2001 per-unit cost restrictions
STATE	Alabama	1	QAP not available	yes
	Alaska	1	.	yes
	Arizona	1	.	yes
	Arkansas	1	QAP not available	.
	California	1	QAP not available	.
	Chicago	1	.	.
	Colorado	1	.	.
	Connecticut	1	.	.
	Delaware	1	yes	.
	Florida	1	.	.
	Georgia	1	yes	yes
	Hawaii	1	.	.
	Idaho	1	.	.
	Illinois	1	.	yes
	Indiana	1	.	yes
	Iowa	1	.	.
	Kansas	1	.	.
	Kentucky	1	.	yes
	Louisiana	1	.	yes
	Maine	1	QAP not available	.
	Maryland	1	.	yes
	Massachusetts	1	.	yes
	Michigan	1	.	yes
	Minnesota	1	.	.
	Mississippi	1	.	.
	Missouri	1	.	yes
	Montana	1	.	.
	Nebraska	1	.	yes
	Nevada	1	.	yes
	New Hampshire	1	.	yes
	New Jersey	1	.	.
	New Mexico	1	.	yes
	New York	1	.	yes
	North Carolina	1	.	yes
	North Dakota	1	.	.
	Ohio	1	.	yes
	Oklahoma	1	.	.
	Oregon	1	.	yes
	Pennsylvania	1	.	yes
	Rhode Island	1	.	yes
	South Carolina	1	.	yes
	South Dakota	1	.	yes
	Tennessee	1	.	yes
	Texas	1	.	.
	Utah	1	.	yes
	Vermont	1	.	yes
	Virginia	1	.	yes
	Washington	1	.	yes
	West Virginia	1	.	yes
	Wisconsin	1	.	yes
	Wyoming	1	.	yes

			1990 fee restrictions	2001 fee restrictions
STATE	Alabama	1	QAP not available	yes
	Alaska	1	yes	yes
	Arizona	1	yes	yes
	Arkansas	1	QAP not available	yes
	California	1	QAP not available	yes
	Chicago	1	.	yes
	Colorado	1	.	yes
	Connecticut	1	.	yes
	Delaware	1	.	yes
	Florida	1	.	yes
	Georgia	1	.	yes
	Hawaii	1	yes	yes
	Idaho	1	.	yes
	Illinois	1	.	yes
	Indiana	1	yes	yes
	Iowa	1	yes	yes
	Kansas	1	yes	yes
	Kentucky	1	.	yes
	Louisiana	1	yes	yes
	Maine	1	QAP not available	.
	Maryland	1	yes	yes
	Massachusetts	1	yes	yes
	Michigan	1	.	yes
	Minnesota	1	yes	yes
	Mississippi	1	yes	.
	Missouri	1	.	yes
	Montana	1	.	yes
	Nebraska	1	yes	yes
	Nevada	1	yes	yes
	New Hampshire	1	yes	yes
	New Jersey	1	yes	yes
	New Mexico	1	yes	yes
	New York	1	.	yes
	North Carolina	1	.	yes
	North Dakota	1	.	yes
	Ohio	1	yes	yes
	Oklahoma	1	yes	yes
	Oregon	1	.	yes
	Pennsylvania	1	yes	yes
	Rhode Island	1	.	yes
	South Carolina	1	.	yes
	South Dakota	1	.	yes
	Tennessee	1	yes	yes
	Texas	1	.	yes
	Utah	1	yes	yes
	Vermont	1	.	yes
	Virginia	1	.	yes
	Washington	1	yes	yes

			1990 builders and sponsors profit and risk allowance	2001 builders and sponsors profit and risk allowance
STATE	Alabama	1	QAP not available	yes
	Alaska	1	yes	yes
	Arizona	1	yes	yes
	Arkansas	1	QAP not available	yes
	California	1	QAP not available	yes
	Chicago	1	.	yes
	Colorado	1	.	yes
	Connecticut	1	.	yes
	Delaware	1	.	yes
	Florida	1	.	yes
	Georgia	1	.	yes
	Hawaii	1	.	yes
	Idaho	1	.	.
	Illinois	1	.	yes
	Indiana	1	yes	yes
	Iowa	1	.	yes
	Kansas	1	.	yes
	Kentucky	1	.	yes
	Louisiana	1	.	yes
	Maine	1	QAP not available	.
	Maryland	1	.	yes
	Massachusetts	1	yes	yes
	Michigan	1	.	yes
	Minnesota	1	yes	.
	Mississippi	1	.	.
	Missouri	1	.	yes
	Montana	1	.	yes
	Nebraska	1	.	yes
	Nevada	1	.	yes
	New Hampshire	1	yes	yes
	New Jersey	1	.	yes
	New Mexico	1	.	yes
	New York	1	.	yes
	North Carolina	1	.	yes
	North Dakota	1	.	yes
	Ohio	1	yes	yes
	Oklahoma	1	.	yes
	Oregon	1	.	.
	Pennsylvania	1	yes	yes
	Rhode Island	1	.	yes
	South Carolina	1	.	yes
	South Dakota	1	.	yes
	Tennessee	1	.	yes
	Texas	1	.	yes
	Utah	1	.	yes
	Vermont	1	.	yes
	Virginia	1	.	yes
	Washington	1	.	yes
	West Virginia	1	.	yes
	Wisconsin	1	.	yes
	Wyoming	1	.	yes

			1990 syndication restrictions	2001 syndication restrictions
STATE	Alabama	1	QAP not available	yes
	Alaska	1	.	.
	Arizona	1	.	.
	Arkansas	1	QAP not available	.
	California	1	QAP not available	yes
	Chicago	1	.	yes
	Colorado	1	.	.
	Connecticut	1	.	.
	Delaware	1	.	.
	Florida	1	.	yes
	Georgia	1	.	.
	Hawaii	1	.	.
	Idaho	1	.	yes
	Illinois	1	.	.
	Indiana	1	.	.
	Iowa	1	.	.
	Kansas	1	.	yes
	Kentucky	1	.	.
	Louisiana	1	.	yes
	Maine	1	QAP not available	.
	Maryland	1	yes	yes
	Massachusetts	1	.	yes
	Michigan	1	.	.
	Minnesota	1	.	.
	Mississippi	1	.	.
	Missouri	1	.	.
	Montana	1	.	.
	Nebraska	1	.	.
	Nevada	1	.	.
	New Hampshire	1	yes	yes
	New Jersey	1	.	yes
	New Mexico	1	.	.
	New York	1	.	yes
	North Carolina	1	.	.
	North Dakota	1	.	.
	Ohio	1	.	.
	Oklahoma	1	.	.
	Oregon	1	.	yes
	Pennsylvania	1	.	yes
	Rhode Island	1	.	yes
	South Carolina	1	.	.
	South Dakota	1	.	.
	Tennessee	1	.	.
	Texas	1	.	.
	Utah	1	.	yes
	Vermont	1	.	.
	Virginia	1	yes	yes
	Washington	1	.	yes
	West Virginia	1	yes	yes
	Wisconsin	1	.	.
	Wyoming	1	.	yes

			1990 legal fee restrictions	2001 legal fee restrictions
STATE	Alabama	1	QAP not available	yes
	Alaska	1	.	yes
	Arizona	1	.	yes
	Arkansas	1	QAP not available	.
	California	1	QAP not available	.
	Chicago	1	.	yes
	Colorado	1	.	.
	Connecticut	1	.	.
	Delaware	1	.	.
	Florida	1	.	.
	Georgia	1	.	.
	Hawaii	1	.	.
	Idaho	1	.	.
	Illinois	1	.	.
	Indiana	1	.	.
	Iowa	1	.	.
	Kansas	1	.	yes
	Kentucky	1	.	.
	Louisiana	1	.	.
	Maine	1	QAP not available	.
	Maryland	1	.	.
	Massachusetts	1	.	.
	Michigan	1	.	.
	Minnesota	1	yes	.
	Mississippi	1	.	.
	Missouri	1	.	.
	Montana	1	.	.
	Nebraska	1	.	yes
	Nevada	1	.	.
	New Hampshire	1	yes	.
	New Jersey	1	.	.
	New Mexico	1	.	.
	New York	1	.	.
	North Carolina	1	.	.
	North Dakota	1	.	.
	Ohio	1	.	.
	Oklahoma	1	yes	.
	Oregon	1	.	.
	Pennsylvania	1	yes	yes
	Rhode Island	1	.	.
	South Carolina	1	.	.
	South Dakota	1	.	.
	Tennessee	1	.	.
	Texas	1	.	.
	Utah	1	.	.
	Vermont	1	.	.
	Virginia	1	.	.
	Washington	1	.	.
	West Virginia	1	.	.
	Wisconsin	1	.	.
	Wyoming	1	.	.

			1990 place-based set-asides (number)	2001 place-based set-asides (number)	1990 people-based set-asides (number)	2001 people-based set-asides (number)
STATE	Alabama	1	QAP not available	.	QAP not available	.
	Alaska	1	.	1	.	.
	Arizona	1	1	2	.	1
	Arkansas	1	QAP not available	.	QAP not available	1
	California	1	QAP not available	1	QAP not available	1
	Chicago	1	.	.	.	.
	Colorado	1	1	.	.	.
	Connecticut	1	.	.	.	.
	Delaware	1	1	1	.	.
	Florida	1	.	2	.	.
	Georgia	1	.	1	.	.
	Hawaii	1	.	.	.	.
	Idaho	1	3	1	.	.
	Illinois	1	1	.	1	.
	Indiana	1	.	2	1	3
	Iowa	1	.	.	.	3
	Kansas	1	.	.	.	.
	Kentucky	1	1	.	.	.
	Louisiana	1	.	1	.	.
	Maine	1	QAP not available	1	QAP not available	1
	Maryland	1	1	.	.	.
	Massachusetts	1	.	.	4	.
	Michigan	1	1	2	1	1
	Minnesota	1	.	.	1	.
	Mississippi	1	.	1	.	.
	Missouri	1	1	1	1	.
	Montana	1	.	.	.	.
	Nebraska	1	.	1	.	.
	Nevada	1	.	1	.	.
	New Hampshire	1	1	.	.	.
	New Jersey	1	.	2	.	2
	New Mexico	1	1	1	.	.
	New York	1	.	.	.	.
	North Carolina	1	1	1	.	.
	North Dakota	1	.	.	.	.
	Ohio	1	.	.	.	.
	Oklahoma	1	1	1	.	.
	Oregon	1	1	1	.	.
	Pennsylvania	1	1	2	.	.
	Rhode Island	1	.	.	.	.
	South Carolina	1	.	1	2	.
	South Dakota	1	1	.	.	.
	Tennessee	1	.	1	.	1
	Texas	1	1	1	.	1
	Utah	1	3	1	.	.
	Vermont	1	.	.	.	.
	Virginia	1	1	1	.	.

			1990 place-based preferences (number)	2001 place-based preferences (number)	1990 people-based preferences (number)	2001 people-based preferences (number)
STATE	Alabama	1	QAP not available	3	QAP not available	6
	Alaska	1	2	2	6	5
	Arizona	1	2	4	6	6
	Arkansas	1	QAP not available	3	QAP not available	6
	California	1	QAP not available	2	QAP not available	5
	Chicago	1	.	2	4	6
	Colorado	1	3	2	7	6
	Connecticut	1	2	2	5	6
	Delaware	1	1	3	5	6
	Florida	1	3	4	3	4
	Georgia	1	3	3	6	3
	Hawaii	1	.	3	6	4
	Idaho	1	4	2	5	4
	Illinois	1	1	2	3	7
	Indiana	1	1	3	6	6
	Iowa	1	3	.	6	7
	Kansas	1	2	3	7	6
	Kentucky	1	1	2	6	6
	Louisiana	1	2	5	7	6
	Maine	1	QAP not available	2	QAP not available	6
	Maryland	1	2	3	4	6
	Massachusetts	1	1	1	6	6
	Michigan	1	3	3	7	6
	Minnesota	1	1	.	5	5
	Mississippi	1	1	1	7	.
	Missouri	1	3	3	6	5
	Montana	1	1	1	4	5
	Nebraska	1	1	3	4	6
	Nevada	1	2	4	7	4
	New Hampshire	1	3	2	5	6
	New Jersey	1	1	3	5	6
	New Mexico	1	1	3	5	5
	New York	1	2	2	7	4
	North Carolina	1	1	4	.	6
	North Dakota	1	2	4	3	5
	Ohio	1	2	4	7	5
	Oklahoma	1	1	3	4	4
	Oregon	1	3	5	4	5
	Pennsylvania	1	1	3	6	6
	Rhode Island	1	.	2	4	3
	South Carolina	1	1	3	7	6
	South Dakota	1	2	3	7	7
	Tennessee	1	1	4	5	5
	Texas	1	3	3	5	6
	Utah	1	4	4	6	6
	Vermont	1	.	2	5	5
	Virginia	1	1	3	5	6
	Washington	1	3	3	5	5
	West Virginia	1	2	3	7	7
	Wisconsin	1	.	4	7	6
	Wyoming	1	1	3	3	6