Identifying a Missed Opportunity in State Disaster Response: An Analysis of State Housing Finance Agencies' Response to Hurricanes Through the Low-Income Housing Tax Credit

A thesis presented by Valerie Weiner

Hurricanes are an affordable housing problem

Outline

States do not adequately address long-term affordable housing safety

> The LIHTC and QAP provide an opportunity for states to do so

States rely too often on federal guidance or support to make policy change

> The QAP is not currently being used to its full potential



### **The Impact of Hurricanes on Housing**



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No one inside of the government has taken the time to really sit down longterm and say what is the permanent solution to the challenges we are facing... ))

- Marion McFadden, vice president for policy at Enterprise Community Partners, an affordablehousing nonproft on the current disaster relief system



M. Scott Mahaskey/ POLITICO

#### Inadequate State Housing Disaster Response

Short-Term Responses to a Long-Term Problem

#### State Communication of Disaster Priorities and Risk





#### State Disaster Relief

#### **Programs and Resources**









Disaster Housing Assistance Program The Opportunity within the Low-Income Housing Tax Credit (LIHTC) and Qualified Allocation Plan (QAP):



The LIHTC is administered by a State Housing Finance Agency (SHFA)

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The program finances the most affordable housing of any public program in the country

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The credits are very competitive, so the language in the QAP (the guiding document for the distribution of LIHTCs) can have significant influence over affordable housing development The Opportunity within the Low-Income Housing Tax Credit (LIHTC) and Qualified Allocation Plan (QAP):

> The QAP Scoring Structure: Establishes Priorities and Advocacy Levels



#### **Research Questions**

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How does the language, and therefore the priorities of state policy makers, change in the Qualified Allocation Plans for Low-income Housing Tax Credits before and after the major hurricanes of the last 10 years? Based on the different categories and incentive strategies within the QAP, how strict are the changes and why?

#### Methodology



Identified the 6 hurricanes based on cost and QAP document availability Identified the terms <u>'flood', 'storm',</u> '<u>disaster', 'hurricane', and</u> <u>the name of the relevant</u> <u>hurricane</u> for simplified content analysis Content analysis of 68 QAPs, 2 per state for 34 states

Analysis of strictness and advocacy of changes Case studies to characterize a change, lack thereof, or level of strictness

### Analysis

# 35% Of the QAPs had language changes

of the changes were 'Disaster'

 $04 {Of}_{the}$ 

05

Of the changes referred directly to the name of the hurricane

05 Of the changes were within the Threshold category

Changes made to 25 state QAPs, none after Hurricane Matthew

## Findings



The Same Mechanisms---public comment, state priority, and federal influence--can influence states to either make a change or not



States supported by federal funding or policy efforts made stricter changes than those with public or developer support or those that made disaster relief a state priority

## **Policy Implications**



Individual state contexts make a significant difference when crafting disaster policies.



Federal support might be considered a more secure investment compared to state or developer support.

## Findings



SHFAs engage often with those who attend public meetings, though they are primarily developers.



States defer to federal priorities and guidelines rather than inventing their own.

## **Policy Implications**

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Public meetings present a great opportunity for states to hear more from housing advocates or residents



This approach makes it seem as though hurricane response is more of a federal issue than a SHFA state-affordable housing issue. Federal priorities may not be appropriate for state affordable housing safety needs Hurricanes are an affordable housing problem

### Conclusion

States do not adequately address long-term affordable housing safety

> The LIHTC and QAP provide an opportunity for states to do so

> > States rely too often on federal guidance or support to make policy change

The QAP is not currently being used to its full potential



# THANK YOU FOR LISTENING

Any questions?



State	Pre-Existing Language	Language Change	Search Terms Prior	Search or Modified Terms Post	
		Hurrican	e Ike		
Texas	Y	Y	Flood, Disaster	Hurricane Ike	
Louisiana	Y	Y	Flood	Hurricane Ike, Flood	
Arkansas	Y	Y	Flood, Disaster	Disaster	
Florida	Y	N	Hurricane, Disaster	N/A	
Ohio	Y	N	Disaster	N/A	
Mississippi	Y	N	Disaster	N/A	
		Hurricane	Irene		
Massachusetts	Y	N	Flood, Storm	N/A	
New York	N	N	N/A	N/A	
New Jersey	N	N	N/A	N/A	
Vermont	Y	Y	Disaster	Disaster	
North Carolina	Y	Y	Flood	Disaster, Flood	
Pennsylvania	Y	N	Disaster	N/A	
State	Pre-Existing	Language	Search Terms Prior	Search or Modified	
	Language	Change	Terms Post		
		Hurricane	Sandy		
New York	N	Y	N/A Disaster		
New Jersey	N	N	N/A	N/A	
Connecticut	Y	Y	Storm, Disaster	Hurricane Sandy	
Massachusetts	Y	N	Flood, Storm N/A		
Rhode Island	Y	N	Disaster, Flood	N/A	
Hurricane Matthew					
Georgia	Y	N	Flood, Disaster	N/A	
South Carolina	Y	N	Flood, Storm N/A		
North Carolina	Y	N	Disaster, Flood N/A		
Florida	Y	N	Disaster	N/A	
Virginia	N	N	N/A	N/A	

# QAP Analysis

State	Pre-Existing	Language	Search Terms Prior	Search or		
	Language	Change		Modified Terms		
				Post		
	Hurricane Harvey					
Texas	Y	Y	Disaster, Flood	Hurricane Harvey,		
				Flood		
Louisiana	Y	N		N/A		
			Flood, Storm			
Mississippi	Y	N	Disaster, Hurricane,	N/A		
			Storm			
Alabama	Y	N	Flood, Storm	N/A		
Tennessee	Y	N	Flood	N/A		
Hurricane Irma						
Florida	Y	N	Disaster, Flood, Storm	N/A		
Georgia	Y	N		N/A		
			Flood, Storm			
South Carolina	Y	Y	Disaster, Hurricane,	Disaster		
			Storm			
North Carolina	Y	N	Disaster, Storm	N/A		
Alabama	Y	N	Flood, Storm	N/A		

### Strictness Assessment



State	Threshold	Fixed-Point	Set-Aside	Variable- Point	Other	
HURRICANE IKE						
Texas			X			
Louisiana	X		X			
Arkansas	X		X			
HURRICANE IRENE						
Vermont	X					
North Carolina			X		X	
		HURRICAN	NE SANDY			
Connecticut		X				
New York	X					
HURRICANE HARVEY						
Texas	X			X		
Louisiana			X			
HURRICANE IRMA						
South Carolina					X	