

# Understanding Whom the LIHTC Program Serves:

## Tenants in LIHTC Units as of December 31, 2012



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## Message From the Assistant Secretary

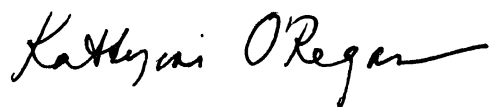
It is my pleasure to present this report, *Understanding Whom the LIHTC Program Serves: Tenants in LIHTC Units as of December 31, 2012*. As mandated through the Housing and Economic Recovery Act (HERA) of 2008, state agencies administering the Low-Income Housing Tax Credit (LIHTC) Program are now required to submit demographic and economic data on LIHTC tenants to the U.S. Department of Housing and Urban Development (HUD). HUD's Office of Policy Development and Research has been working with states to develop a process for compiling, transmitting, and now releasing the tenant data. This report marks the first release of those national data on LIHTC tenants.

Getting to this point has required a tremendous effort from states, whose existing data and compliance systems needed to change to accommodate a standardized and electronic system of data submission. In addition, HERA requires the collection and submission of new data, requiring new collection efforts and creating additional burden on states. At the same time, HUD needed to develop a completely new system for receiving and processing such data. HERA authorized \$6 million to support the creation of this new system, but funding was never appropriated. In the absence of those resources, states and HUD managed the development of these new systems within existing resources and through an iterative and cooperative process. The National Council of State Housing Agencies (the membership organization for agencies administering the LIHTC Program) has been an invaluable partner as we have worked with states to improve processes (ours and theirs) and improve data. Each year, the quality and coverage of the data improve. The preparation of this report surfaced numerous data issues that states have already begun addressing, which will be reflected in higher quality data next year.

Although it is not possible to name all the staff at all the housing finance agencies who worked to provide these data to HUD, I would like to acknowledge the team at HUD who contributed to the production of this report. I am particularly grateful for Mike Hollar, who authored this report, and Shanti Karimsetti, who provided invaluable assistance tabulating the data. I also thank Alastair McFarlane, Danilo Pelletiere, and Lydia Taghavi for providing valuable input throughout the production of this report.

This report provides summary tables of state tenant data received for tenants as of December 2012. There are numerous caveats on the coverage of these data, which are far from complete in some states, or for some specific variables, as discussed in section IV. Each table in the report is structured to provide readers with the information needed to make informed decisions about where the coverage and data are best, both in terms of which states and which variables.

That said, LIHTC is a critical tool for creating and preserving affordable rental housing for low-income households, and this report is a first of many steps in an effort to better understand those whom the LIHTC Program serves. I thank all those who worked to make this report possible and whose continuing commitment will refine it to better help policy and practice in the future.



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## **I. Introduction**

The Low-Income Housing Tax Credit (LIHTC) Program provides tax credits to developers of affordable rental housing. The tax credits are provided during the first 10 years of a minimum 30-year compliance period during which rent and income restrictions apply. The LIHTC Program, although established in the U.S. Internal Revenue Code (IRC), is structured such that state-allocating agencies administer most aspects of the program, including income and rent compliance, with the Internal Revenue Service (IRS) providing oversight and guidance. Local administration allows states to address affordable housing needs specific to their populations.

As part of state compliance enforcement, each state has developed its own version of the Tenant Income Certification (TIC) form, which requests information from property managers to ensure that tenants meet LIHTC Program household income limits and property managers are setting rents within LIHTC Program maximum limits. In addition to collecting income and rent information, many states have also collected demographic information, each according to their own standards and for their own uses. Thus, although income and rent information was collected across states using fairly uniform standards and definitions, the demographic information was not standardized and, in some states, not collected at all.

In 2008, Congress passed the Housing and Economic Recovery Act (HERA), requiring each state housing finance agency (HFA) that administers the LIHTC Program to submit certain demographic and economic information on tenants in LIHTC units to the U.S. Department of Housing and Urban Development (HUD) according to standards determined by the Secretary of HUD. HERA specifically requires HFAs to submit to HUD information concerning race, ethnicity, family composition, age, income, use of rental assistance, disability status, and monthly rental payments of households residing in LIHTC properties. HERA also authorized \$6 million to support the creation and operation of this new tenant data collection effort, but those resources were never appropriated.

After a public comment period, consultation with the affected state HFAs, and approval by the U.S. Office of Management and Budget (OMB), HUD published the required data submission standards in early 2010. HUD's published standards were based primarily on standards recommended by the National Council of State Housing Agencies (NCSHA) to the state LIHTC-administering agencies for their determination of tenant qualification. Although HUD's standards were similar to those used by most state housing agencies, the process of incorporating changes; collecting the new information; and modifying states' abilities to collect, maintain, and transmit the information to HUD electronically took several years. During the first several annual collections, few states were able to submit information from a majority of properties, units, or tenants.

This report represents the first public release of information under the HERA mandate. Although the information reported here is not inclusive of all tenants served by the LIHTC Program, HUD believes it provides a useful picture of the program's beneficiaries. The information presented within was received by HUD in the fall of 2013 and includes tenants in LIHTC units as of December 31, 2012. Sections II and III provide background on the LIHTC Program and the HERA mandate. Because this report addresses the first release of tenant data, and data completeness is an issue for some states and some variables, section IV provides an assessment of property, unit, and tenant coverage by state. Section V then provides a discussion of the submitted economic and demographic data required under HERA.

## **II. Background**

### **A. Overview of the Low-Income Housing Tax Credit Program**

The LIHTC Program was established in the Tax Reform Act of 1986 and enacted as Section 42 of the IRC. The program replaced tax provisions that allowed owners of rental housing, including passive investors, to deduct operating losses against other income, which encouraged reduced rental rates. LIHTCs are provided to the owners of rental properties to finance construction or substantial rehabilitation of rental properties. In return, property owners must maintain federally set income and rent restrictions for a minimum of 30 years. The tax credits, which are taken over a period of 10 years, are determined based on the construction or rehabilitation costs of a rental property so that the present value of the tax credits are equal to either 70 or 30 percent of these costs. Owners can obtain the tax credits either through a competitive HFA-administered process or through the use of state-issued private activity bonds. Owners may begin claiming the tax credits after the property<sup>1</sup> is placed in service and the administering state HFA confirms the property is in compliance with IRS requirements.

HUD's administrative responsibility in the LIHTC Program is strictly limited to the designation Difficult Development Areas (DDAs) and Qualified Census Tracts (QCTs)<sup>2</sup>. HUD is not involved in the compliance of LIHTC properties unless HUD subsidies are present. HUD's collection of tenant data, although required by statute, is not used in program administration.

### **B. Tenant Income Certification**

The information required by HUD and tabulated in this report, as part of the HERA-mandated data collection, is also collected on state TIC forms, which property owners must provide to the administering HFA to demonstrate compliance with program rent and income rules. TIC forms currently are state specific. Most, if not all, states collect information using their TIC forms in addition to that required by IRS rules and tax statutes.

### **C. Qualified Allocation Plans**

The LIHTC statute requires HFAs to maintain plans, called Qualified Allocation Plans (QAPs), explaining how the LIHTC Program will be administered in each state. QAPs include a state's method for allocating its share of LIHTCs and procedures for monitoring compliance. Although the LIHTC statute does not require QAPs to include the submission of HERA-mandated tenant information as a criterion for compliance, many states include the provision of this information as a component of compliance. This provision is pertinent primarily for demographic information, such as race, ethnicity, and disability status, because income, rent, and other categories required by HERA are necessary to monitor compliance with other program rules.

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<sup>1</sup> Tax credits technically are awarded to buildings rather than properties.

<sup>2</sup> Developers who locate LIHTC properties in DDAs or QCTs are eligible for 30 percent more tax credits than otherwise allowed.

***D. HUD's Collection of LIHTC Properties Placed in Service***

In addition to collecting information on tenants in LIHTC units, HUD annually collects characteristics of LIHTC properties placed in service (hereafter, PIS data). HUD began this property-level data collection in 1999 and, although state participation remained voluntary, all states participated each year. Before the passage of HERA in 2008, HUD contracted with Abt Associates Inc. to collect the information directly from each HFA. This method enabled each HFA to provide the requested information in the most convenient format for each agency. Although the information was often provided in Excel spreadsheets preformatted by Abt, some agencies provided hard copies of the requested information, which required hand entry by Abt. After the passage of HERA and the mandate to collect data on all tenants in LIHTC units, HUD revised the PIS data submission process and began requiring electronic submission through the same process as established for the tenant data. This revision required HFAs to produce XML-formatted<sup>3</sup> files and to submit the files directly to HUD.

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<sup>3</sup> XML, or eXtensible Markup Language, is a commonly used format that allows for the transfer of structured data.



### **III. Standards and Definitions for HERA-Mandated Tenant Information Collection**

HERA requires HUD to establish standards and definitions for the mandated data submission. To minimize the burden on state HFAs, HUD adopted a modified version of the NCSHA's model TIC form, which serves as the basis for most state TIC forms used to ensure compliance with program income and rent restrictions. In accordance with the statute, HUD relies on established program standards and definitions to reduce reporting burden on states and property managers.

HUD's LIHTC Tenant Data Collection Form requests information for eight broad categories. Part I of the form (Development Data) requests information describing the property and unit, such as property name, address, unit number, number of bedrooms, and program identifying codes. Part II (Household Composition) requests the HERA-required demographic information for each household member, including race, ethnicity, disability status, and date of birth. Information from these sections, in addition to information from HUD's LIHTC PIS data collection, enables HUD to determine the completeness of the information received.

Parts III (Gross Annual Income) and IV (Income from Assets) request information on household income, which is collected by state agencies to confirm program eligibility and enforce compliance rules. Although states collect annual income and income from assets for each household member, HUD requires reporting of only total household income. Part V (Determination of Income Eligibility) requests information indicating which federal income restriction the household meets. The LIHTC Program requires owners to reserve rent-restricted units for households at or below either 50 or 60 percent of Area Median Gross Income (AMGI). Properties that agree to maintain lower income restrictions indicate that information as well, although the poor coverage of those data prohibits their inclusion in this report.

Part VI (Monthly Rent) requests information about various components of monthly rent, including tenant payments and monthly rental assistance. Part VII (Student Status) requests information about the household's student exception if all occupants are full-time students, an occurrence that, in general, is prohibited in the LIHTC Program. The final section, Part VIII (Program Type), requests information about whether the unit complies with the occupancy requirements of the HOME and other federal affordable housing programs (applicable for units receiving other funding).

## **IV. Completeness of 2013 Tenant Data**

Information on tenants in rent-restricted LIHTC units as of December 31, 2012, was collected in the fall of 2013. As required by statute, the information was submitted to HUD by state HFAs, which collect and maintain the data as part of program compliance. Although data quality and completeness have improved with each submission year, because of a variety of issues discussed subsequently, the data submitted by states varied in completeness in terms of properties and units reported and, within those units, household members. To the extent that coverage is low in any particular state, the characteristics of reported tenants may not be representative of the full population served by the LIHTC Program in that state. This section of the report provides information on coverage to aid the reader in interpreting the data used throughout this report.

### **A. States Submitting Tenant Data**

The LIHTC Program is administered by 60 state-level and, in limited instances, substate allocating housing finance agencies.<sup>4</sup> Several states separate administrative functions between multiple state agencies or local suballocators. The District of Columbia and the states of Massachusetts and New York separate functions related to the allocation of tax credits and the issuance of tax-exempt private activity bonds between two agencies. Compliance for all properties in the District of Columbia and Massachusetts, however, is conducted by a single agency in each state. Illinois, New York, and Minnesota allow local suballocators to award LIHTCs in certain cities or counties. The city of Chicago has authority to award credits and administer the program within city limits. New York City and several northern counties<sup>5</sup> receive suballocations from New York State. Minnesota allows seven local governments to allocate tax credits,<sup>6</sup> although the state conducts compliance.

HUD requests tenant data and property characteristics from the 60 agencies that conduct program compliance (for simplicity, hereafter referred to as “states”). All states provided tenant data in response to HUD’s request except the District of Columbia and New Mexico. None of the suballocators in Illinois or New York, however, submitted tenant data to HUD.<sup>7</sup> Thus, tabulations for those two states provide only a partial understanding of the LIHTC Program and are representative of their LIHTC stocks excluding Chicago and New York City, respectively. The following sections explain how the submitted information may be incomplete for each of the states.

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<sup>4</sup> This total includes the District of Columbia, Guam, Puerto Rico, and Virgin Islands. Aside from the use of the Tax Credit Exchange Program in 2009, American Samoa does not actively administer the LIHTC Program and is not counted here.

<sup>5</sup> The Development Authority of the North Country administers the LIHTC Program in Jefferson, Lewis, and St. Lawrence Counties, New York.

<sup>6</sup> Dakota and Washington Counties and the cities of Duluth, Minneapolis, Saint Cloud, Saint Paul, and Rochester each receive a portion of the state allocation.

<sup>7</sup> The District of Columbia, New Mexico, and the New York City Housing Development Corporation have submitted 2013 tenant data.

## ***B. Properties in the Tenant Data***

HUD's collection of LIHTC tenant data applies to all active LIHTC properties, including those in the extended-use period. Many states were unable to submit information for all active properties, however, for several reasons. First, many states simplify or decrease the stringency of compliance rules after Year 15, which lessens or eliminates certain information otherwise collected for compliance. For example, annual income recertifications may no longer be required because the Next Available Unit Rule does not apply during the extended-use period. Thus, states may not have previously maintained compliance information for properties in the extended-use period.<sup>8</sup> Second, some states previously accepted Tenant Income Certification forms from smaller properties in hard copy as opposed to electronically because many of these properties are managed by independent owners who may not have the ability to submit electronically. Converting or hand-entering the information into electronic compliance and reporting systems requires considerable time, and some states were not able to complete this type of labor-intensive work. Third, the Housing and Economic Recovery Act permits states to forgo annual income recertification of tenants if 100 percent of a building's units are income or rent restricted.<sup>9</sup> Income information from tenants in these properties, therefore, may not be available or, if available, may not be current. As explained subsequently, in order to present an appropriate comparison, HUD's tabulation of income excludes incomes not certified in 2011 or 2012.<sup>10</sup>

One method of assessing the completeness of each state's HERA-mandated tenant data is to compare the total number of properties the data contain with the number of properties reported to HUD through its LIHTC PIS data collection,<sup>11</sup> summarized in table 1. The time period covered in HUD's PIS data collection is consistent with the tenant collection and currently includes properties placed in service through 2012. HUD's PIS database also has known undercounting, however, primarily for the most recently collected placed-in-service years.<sup>12</sup> Hence, neither database is expected to be 100 percent complete, and, from the data available to HUD, it is not possible to provide a definitive assessment of completeness based on one number. Rather, comparisons across the two sources of data suggest where issues of incomplete data (in either data source) may be larger.

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<sup>8</sup> Massachusetts did not submit tenant data for properties in the extended-use period for this reason but plans to do so in future submissions.

<sup>9</sup> Annual recertification is not needed in this case because the Next Available Unit Rule does not apply, and the program allows tenants to remain in rent-restricted units if household income increases after initial certification to exceed income limits. Some states, however, require recertification for at least 1 additional year.

<sup>10</sup> In a few states, some incomes were certified in early 2013, and these data are also included.

<sup>11</sup> As discussed in section II.D, HUD annually collects information on LIHTC properties placed in service during the previous calendar year. This information is available from <http://lihtc.huduser.org/>.

<sup>12</sup> In addition to underreporting because of technicalities of determining placed-in-service status, several states (Connecticut, Illinois, Missouri, Nebraska, Nevada, New Mexico, Texas, Utah, Virginia, Washington, and West Virginia) did not submit any information in recent years. See the database at <http://lihtc.huduser.org/> for years of nonreporting.

**Table 1. Number and Percentage of Properties Matched Between Property and Tenant Databases**

| State                     | 2012 PIS Database     |                          |                  |                          |                                     | 2012 LIHTC HERA-Mandated Tenant Data |                         |                  |                         |                                    | In Both Databases |                  |
|---------------------------|-----------------------|--------------------------|------------------|--------------------------|-------------------------------------|--------------------------------------|-------------------------|------------------|-------------------------|------------------------------------|-------------------|------------------|
|                           | All Active Properties | Matched to HERA Data (%) | All Active Units | Matched to HERA Data (%) | Properties Not Matched to HERA Data | All Active Properties                | Matched to PIS Data (%) | All Active Units | Matched to PIS Data (%) | Properties Not Matched to PIS Data | Active Properties | Active Units     |
| Alabama                   | 705                   | 47.1                     | 35,936           | 28.7                     | 368                                 | 355                                  | 93.5                    | 11,651           | 88.6                    | 23                                 | 332               | 10,320           |
| Alaska                    | 90                    | 20.0                     | 3,469            | 19.9                     | 73                                  | 19                                   | 94.7                    | 704              | 97.9                    | 1                                  | 18                | 689              |
| Arizona                   | 373                   | 71.3                     | 28,192           | 64.1                     | 96                                  | 295                                  | 90.2                    | 21,984           | 82.2                    | 29                                 | 266               | 18,075           |
| Arkansas                  | 607                   | 63.4                     | 28,444           | 58.6                     | 194                                 | 396                                  | 97.2                    | 17,284           | 96.5                    | 11                                 | 385               | 16,680           |
| California                | 3,018                 | 82.3                     | 240,434          | 72.0                     | 463                                 | 2,666                                | 93.2                    | 204,956          | 84.5                    | 182                                | 2,484             | 173,122          |
| Colorado                  | 444                   | 77.3                     | 28,549           | 55.9                     | 99                                  | 402                                  | 85.3                    | 23,605           | 67.6                    | 59                                 | 343               | 15,948           |
| Connecticut               | 307                   | 69.1                     | 18,028           | 57.4                     | 115                                 | 235                                  | 90.2                    | 13,536           | 76.5                    | 23                                 | 212               | 10,354           |
| Delaware                  | 123                   | 90.2                     | 7,147            | 84.9                     | 12                                  | 115                                  | 96.5                    | 6,349            | 95.6                    | 4                                  | 111               | 6,067            |
| District of Columbia      | 124                   | N/A                      | 17,850           | N/A                      | 124                                 | Data Not Reported                    |                         |                  |                         |                                    | N/A               |                  |
| Florida                   | 1,068                 | 72.8                     | 148,304          | 72.0                     | 283                                 | 964                                  | 80.7                    | 144,398          | 74.0                    | 186                                | 778               | 106,839          |
| Georgia                   | 1,018                 | 64.0                     | 95,050           | 47.9                     | 424                                 | 689                                  | 94.6                    | 52,474           | 86.8                    | 37                                 | 652               | 45,537           |
| Guam                      | 5                     | 100.0                    | 433              | 100.0                    | 0                                   | 5                                    | 100.0                   | 433              | 100.0                   | 0                                  | 5                 | 433              |
| Hawaii                    | 72                    | 91.7                     | 6,490            | 54.2                     | 6                                   | 72                                   | 91.7                    | 6,330            | 55.6                    | 6                                  | 66                | 3,517            |
| Idaho                     | 189                   | 100.0                    | 7,698            | 100.0                    | 8                                   | 215                                  | 87.9                    | 8,443            | 91.2                    | 15                                 | 189               | 7,698            |
| Illinois <sup>a</sup>     | 1,197                 | 42.4                     | 75,150           | 32.9                     | 658                                 | 515                                  | 98.4                    | 25,342           | 97.6                    | 8                                  | 507               | 24,725           |
| Indiana                   | 578                   | 63.3                     | 37,792           | 28.4                     | 247                                 | 442                                  | 82.8                    | 13,258           | 81.1                    | 76                                 | 366               | 10,749           |
| Iowa                      | 594                   | 70.0                     | 21,641           | 64.0                     | 174                                 | 469                                  | 88.7                    | 17,498           | 79.2                    | 53                                 | 416               | 13,859           |
| Kansas                    | 604                   | 74.3                     | 28,175           | 61.0                     | 137                                 | 467                                  | 96.1                    | 21,052           | 81.6                    | 18                                 | 449               | 17,173           |
| Kentucky                  | 736                   | 74.7                     | 24,203           | 80.6                     | 177                                 | 562                                  | 97.9                    | 20,750           | 94.0                    | 12                                 | 550               | 19,509           |
| Louisiana                 | 1,049                 | 38.2                     | 56,693           | 33.4                     | 571                                 | 432                                  | 92.8                    | 20,352           | 93.1                    | 31                                 | 401               | 18,943           |
| Maine                     | 187                   | 64.2                     | 6,306            | 70.6                     | 67                                  | 122                                  | 98.4                    | 4,720            | 94.3                    | 2                                  | 120               | 4,452            |
| Maryland                  | 694                   | 62.0                     | 59,832           | 45.9                     | 285                                 | 454                                  | 94.7                    | 34,735           | 79.1                    | 24                                 | 430               | 27,464           |
| Massachusetts             | 750                   | 66.9                     | 50,774           | 60.4                     | 239                                 | 580                                  | 86.6                    | 39,917           | 76.8                    | 78                                 | 502               | 30,653           |
| Michigan                  | 1,274                 | 67.9                     | 70,000           | 64.3                     | 388                                 | 1,008                                | 85.8                    | 62,276           | 72.2                    | 143                                | 865               | 44,990           |
| Minnesota                 | 626                   | 40.7                     | 27,500           | 33.9                     | 356                                 | 378                                  | 67.5                    | 16,159           | 57.8                    | 123                                | 255               | 9,334            |
| Mississippi               | 572                   | 88.6                     | 31,585           | 85.7                     | 64                                  | 512                                  | 99.0                    | 27,450           | 98.7                    | 5                                  | 507               | 27,084           |
| Missouri                  | 1,561                 | 47.9                     | 53,680           | 56.8                     | 789                                 | 946                                  | 79.1                    | 44,106           | 69.1                    | 198                                | 748               | 30,499           |
| Montana                   | 210                   | 81.9                     | 6,047            | 82.1                     | 36                                  | 175                                  | 98.3                    | 5,227            | 94.9                    | 3                                  | 172               | 4,963            |
| Nebraska                  | 239                   | 97.5                     | 6,970            | 96.8                     | 3                                   | 317                                  | 73.5                    | 10,413           | 64.8                    | 84                                 | 233               | 6,750            |
| Nevada                    | 206                   | 69.4                     | 20,207           | 74.5                     | 58                                  | 208                                  | 68.8                    | 22,125           | 68.1                    | 65                                 | 143               | 15,063           |
| New Hampshire             | 183                   | 51.9                     | 6,648            | 30.4                     | 88                                  | 157                                  | 60.5                    | 5,040            | 40.2                    | 62                                 | 95                | 2,024            |
| New Jersey                | 671                   | 33.2                     | 43,815           | 39.4                     | 446                                 | 461                                  | 48.4                    | 33,128           | 52.2                    | 238                                | 223               | 17,278           |
| New Mexico                | 229                   | N/A                      | 12,686           | N/A                      | 229                                 | Data Not Reported                    |                         |                  |                         |                                    | N/A               |                  |
| New York <sup>a</sup>     | 2,459                 | 34.2                     | 128,433          | 39.4                     | 1,571                               | 1,017                                | 82.7                    | 64,329           | 78.6                    | 176                                | 841               | 50,574           |
| North Carolina            | 1,294                 | 72.0                     | 52,474           | 91.7                     | 333                                 | 938                                  | 99.4                    | 48,410           | 99.4                    | 6                                  | 932               | 48,096           |
| North Dakota              | 171                   | 93.6                     | 5,198            | 92.7                     | 10                                  | 162                                  | 98.8                    | 4,886            | 98.7                    | 2                                  | 160               | 4,821            |
| Ohio                      | 1,081                 | 71.9                     | 75,170           | 73.9                     | 289                                 | 794                                  | 97.9                    | 56,831           | 97.7                    | 17                                 | 777               | 55,524           |
| Oklahoma                  | 460                   | 57.4                     | 22,970           | 51.6                     | 193                                 | 378                                  | 69.8                    | 18,371           | 64.6                    | 114                                | 264               | 11,864           |
| Oregon                    | 536                   | 5.4                      | 30,942           | 2.2                      | 507                                 | 35                                   | 82.9                    | 800              | 85.3                    | 6                                  | 29                | 682              |
| Pennsylvania              | 858                   | 88.9                     | 34,298           | 95.0                     | 89                                  | 987                                  | 77.3                    | 45,231           | 72.1                    | 224                                | 763               | 32,592           |
| Puerto Rico               | 200                   | 76.5                     | 17,598           | 71.0                     | 38                                  | 175                                  | 87.4                    | 14,741           | 84.8                    | 22                                 | 153               | 12,501           |
| Rhode Island              | 187                   | 64.7                     | 10,958           | 63.8                     | 62                                  | 164                                  | 73.8                    | 10,007           | 69.9                    | 43                                 | 121               | 6,994            |
| South Carolina            | 698                   | 44.0                     | 33,916           | 39.5                     | 364                                 | 358                                  | 85.8                    | 15,452           | 86.7                    | 51                                 | 307               | 13,404           |
| South Dakota              | 202                   | 69.3                     | 6,991            | 70.4                     | 60                                  | 181                                  | 77.3                    | 6,550            | 75.1                    | 41                                 | 140               | 4,921            |
| Tennessee                 | 909                   | 45.9                     | 53,477           | 62.8                     | 469                                 | 427                                  | 97.7                    | 34,032           | 98.7                    | 10                                 | 417               | 33,576           |
| Texas                     | 1,860                 | 51.4                     | 176,720          | 62.8                     | 809                                 | 1,488                                | 64.2                    | 170,443          | 65.1                    | 532                                | 956               | 110,997          |
| Utah                      | 370                   | 84.6                     | 19,122           | 80.3                     | 53                                  | 319                                  | 98.1                    | 15,392           | 99.8                    | 6                                  | 313               | 15,360           |
| Vermont                   | 241                   | 55.2                     | 5,277            | 53.0                     | 107                                 | 232                                  | 57.3                    | 5,442            | 51.4                    | 99                                 | 133               | 2,797            |
| Virgin Islands            | 24                    | 79.2                     | 1,324            | 64.2                     | 5                                   | 22                                   | 86.4                    | 1,011            | 84.1                    | 3                                  | 19                | 850              |
| Virginia                  | 827                   | 75.5                     | 71,995           | 74.2                     | 183                                 | 846                                  | 73.8                    | 73,838           | 72.3                    | 222                                | 624               | 53,411           |
| Washington <sup>b</sup>   | 996                   | 1.5                      | 68,139           | 11.8                     | 747                                 | 67                                   | 22.4                    | 23,552           | 34.2                    | 52                                 | 15                | 8,059            |
| West Virginia             | 267                   | 79.0                     | 10,725           | 78.1                     | 64                                  | 234                                  | 90.2                    | 9,947            | 84.2                    | 23                                 | 211               | 8,375            |
| Wisconsin                 | 766                   | 58.1                     | 24,326           | 80.7                     | 306                                 | 462                                  | 96.3                    | 20,659           | 95.0                    | 17                                 | 445               | 19,630           |
| Wyoming                   | 98                    | 67.3                     | 4,360            | 43.7                     | 37                                  | 89                                   | 74.2                    | 2,751            | 69.2                    | 23                                 | 66                | 1,905            |
| <b>All reported areas</b> | <b>34,807</b>         | <b>58.9</b>              | <b>2,160,141</b> | <b>57.3</b>              | <b>13,573</b>                       | <b>24,008</b>                        | <b>85.4</b>             | <b>1,578,370</b> | <b>78.4</b>             | <b>3,488</b>                       | <b>20,509</b>     | <b>1,237,724</b> |

HERA = Housing and Economic Recovery Act. LIHTC = low-income housing tax credit. N/A = not applicable. PIS = LIHTC Properties Placed in Service database.

<sup>a</sup> Does not include tenant data from suballocators in Illinois or New York.

<sup>b</sup> Property names for properties in Washington’s tenant data were submitted primarily as Building Identification Numbers, precluding an accurate match.

Notes: The five columns under the heading 2012 PIS Database represent the number of active properties and rent-restricted units reported in the U.S. Department of Housing and Urban Development’s (HUD’s) PIS database and the percentage of those properties (and corresponding units) matched to properties submitted through the HERA-mandated LIHTC Tenant Data Collection Form. The five columns under the heading 2012 LIHTC HERA-Mandated Tenant Submission represent the number of properties and rent-restricted units submitted through the LIHTC Tenant Data Collection Form and the percentage of those properties (and corresponding units) matched to properties reported through HUD’s LIHTC PIS data collection. The last two columns, under the heading In Both Databases provide the number of properties (and corresponding units) reported in both HUD’s PIS database and the LIHTC tenant database.

Table 1 excludes properties identified as no longer monitored for LIHTC compliance. In the nation, 34,807 properties are reported as active in the LIHTC Program in HUD's PIS database. Through the tenant data collection, state HFAs submitted information for 24,008 properties. The difference between these two counts may be explained, in addition to the reasons previously stated, in part from the PIS database's incorrect categorization of some LIHTC properties as active if states have not updated the property's activity status with HUD, producing an inflated account of the active LIHTC properties. This factor is hard to distinguish from underreporting in the tenant data.

To produce a more informed account of properties reported through the HERA-mandated tenant submission, HUD matched the two sets of data using property name and program-specific identification numbers.<sup>13</sup> The results of this matching are also reported in table 1. Overall, 58.9 percent of active properties in HUD's PIS database could be matched to properties submitted through the HERA-mandated tenant data collection.<sup>14</sup> Some of this relatively low overall match rate reflects nonreporting of the District of Columbia, the state of New Mexico, and the cities of Chicago and New York. Among states that reported for all allocating agencies, the match rate was slightly higher, at 61.5 percent, with large variation across states. Only 5 states have matching rates of 90 percent or higher and most states (35, excluding Illinois and New York) have matching rates below 75 percent. These varying match rates provide an indication of the completeness of the tenant data for each state, driven by the factors cited previously.

In addition to suffering from incompleteness, however, matching rates from the PIS database to HERA-mandated tenant data may suffer from poor matching, in part because of changes in property names since they were originally placed in service and first reported to HUD's PIS database. To the extent that poor matching is an issue, a state would have a low matching rate in both directions, meaning that a similarly large share of properties in the tenant data would not be matched to HUD's PIS data (also reported in table 1). For example, Nevada had nearly identical matching rates of 69 percent and nearly identical numbers of properties across both databases. In this case, the low match rate of PIS properties to the tenant data need not suggest incomplete tenant data. On the other hand, although poor matching may explain a small portion of Tennessee's 45.9 percent PIS match to tenant data, given that nearly 98 percent of properties in the Tennessee tenant data were successfully matched to PIS data, it cannot be a large factor. Of the properties submitted through the HERA tenant data collection, nationally, 85.4 percent were matched to properties in the PIS database, much higher than the 58.9 percent of PIS properties matched to the tenant data.

As mentioned previously, the matching rate between the two datasets varied widely across the states. The tenant submissions from one-third of states had property matching rates above 90 percent, providing confidence that nearly all the active LIHTC properties in those states are in the HUD PIS database. On the other hand, about one-third matched between 50 and 75 percent of properties from their HERA-mandated tenant data to the PIS data. In those cases, it is less clear that the PIS data are nearly complete.

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<sup>13</sup> HUD used property names, addresses, state-assigned Project Identification Numbers, and IRS-required Building Identification Numbers to match the PIS and tenant datasets.

<sup>14</sup> Note that this percentage indicates that at least one unit from the property was submitted in the tenant submission and does not imply that all units within the matched properties were provided.

Hence, the PIS database may not provide an accurate benchmark for assessing the completeness of the tenant data (the main focus of table 1). As mentioned previously, however, incomplete matching also contributes to these lower rates and is a factor when interpreting data coverage.

### **C. Units**

The HERA-mandated collection of LIHTC tenant data is intended to include all income- or rent-restricted LIHTC units. Because HUD's PIS data include only property address and not unit address, it is not possible to match actual units. Instead, table 1 sums the number of units from matched properties in the PIS database and reported units from matched properties in the tenant collection. Across all states, 2.160 million active LIHTC units are in HUD's PIS database. State HFAs, however, reported data on tenants in 1.578 million units<sup>15</sup> through the HERA-mandated tenant submission to HUD. The number of units in matched properties is 1.237 million.

Although information is submitted on a unit basis, the information in this report focuses primarily on households or individual members, such as heads of household. The difference between reported units and total number of households is the number of vacant units. The vacancy rate of reported units was approximately 5 percent.

### **D. Household Members**

Much of the information required by HERA focuses on households or individual household members. As required by HERA, HUD requests household-level information, such as rent and income, and individual member information, such as race, ethnicity, and disability status. In addition, HUD requests information on a household member's age and relationship to the head of the household, both of which can be used to determine household composition, which is a HERA-required reporting category. However, 11 states provided data for only one household member, usually reported as the head of the household.<sup>16</sup> In addition, not all states reported all certified household members when reporting on individual household members, which affects the extent to which their data can be used to report on all tenants versus all households. For some analyses, such as reporting household composition, this factor is difficult to assess in states with incomplete data on all household members. Hence, for tables presenting information on individuals as opposed to households, it is important to have some sense of the coverage of household members.

States do provide information on household size, which is used to determine maximum applicable income limit determination during household income certification. When all household members are included, household size equals the number of household members for whom data are submitted. Table 2 compares household size at certification with the number of household members actually reported in the tenant data. The first column reports the share of households for which household size at certification was not reported; that is, households for which HUD is unable to determine whether all household members are included in the tenant data. Reporting of household size is quite complete overall; household size is missing in only 0.3 percent of households. With the exception of Alaska, which did not report household size for any households, this variable can be used to assess the completeness of household members in the tenant data.

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<sup>15</sup> This total includes both vacant and occupied units.

<sup>16</sup> The reporting of the head of household in the LIHTC Program is merely for reference and is unrelated to status reported on individual income returns.

**Table 2. Reported Number of Household Members Compared With Household Size at Certification**

| State                       | Household Size at Certification Not Reported (%) | Occupied Units With Reported Number of Household Members |   |   |
|-----------------------------|--|--|---|---|
|                             |  | Less Than Reported Household Size at Certification (%)   | Equals Reported Household Size at Certification (%) | Greater Than Reported Household Size at Certification (%) |
| Alabama                     | 0.0  | 4.5  | 85.8  | 9.7   |
| Alaska                      | 100.0  | <i>Data Not Reported</i>                                 |   |   |
| Arizona                     | 0.3  | 1.2  | 97.7  | 1.2   |
| Arkansas                    | 0.0  | 0.0  | 99.2  | 0.8   |
| California                  | 0.2  | 0.1  | 99.5  | 0.4   |
| Colorado                    | 0.0  | 6.0  | 84.6  | 9.4   |
| Connecticut <sup>a</sup>    | 0.0  | 48.5   | 51.4  | 0.0   |
| Delaware                    | 0.0  | 0.0  | 100.0   | 0.0   |
| District of Columbia        |  | <i>Data Not Reported</i>                                 |   |   |
| Florida <sup>a</sup>        | 0.0  | 66.6   | 33.4  | 0.0   |
| Georgia                     | 0.0  | 0.0  | 100.0   | 0.0   |
| Guam                        | 0.5  | 1.9  | 96.6  | 1.4   |
| Hawaii <sup>a</sup>         | 0.0  | 53.2   | 46.8  | 0.0   |
| Idaho                       | 6.7  | 1.2  | 94.5  | 4.2   |
| Illinois <sup>b</sup>       | 0.0  | 18.1   | 79.2  | 2.6   |
| Indiana                     | 0.0  | 3.2  | 56.4  | 40.4  |
| Iowa                        | 0.0  | 4.2  | 95.5  | 0.3   |
| Kansas                      | 0.0  | 0.0  | 100.0   | 0.0   |
| Kentucky                    | 5.0  | 5.6  | 91.7  | 2.6   |
| Louisiana                   | 0.0  | 1.5  | 98.0  | 0.5   |
| Maine                       | 0.0  | 0.0  | 99.5  | 0.5   |
| Maryland <sup>a</sup>       | 0.0  | 42.6   | 57.4  | 0.0   |
| Massachusetts <sup>a</sup>  | 0.0  | 51.7   | 48.3  | 0.0   |
| Michigan                    | 0.0  | 0.0  | 99.0  | 1.0   |
| Minnesota <sup>a</sup>      | 0.1  | 60.7   | 39.2  | 0.1   |
| Mississippi                 | 0.0  | 0.9  | 98.6  | 0.5   |
| Missouri                    | 0.0  | 1.1  | 98.5  | 0.4   |
| Montana                     | 0.0  | 0.0  | 99.7  | 0.3   |
| Nebraska                    | 0.0  | 1.4  | 97.8  | 0.8   |
| Nevada                      | 0.0  | 0.7  | 98.9  | 0.4   |
| New Hampshire               | 0.0  | 0.0  | 99.3  | 0.7   |
| New Jersey                  | 0.0  | 0.0  | 100.0   | 0.0   |
| New Mexico                  |  | <i>Data Not Reported</i>                                 |   |   |
| New York <sup>b</sup>       | 3.5  | 19.7   | 79.5  | 0.7   |
| North Carolina              | 0.0  | 25.3   | 74.7  | 0.0   |
| North Dakota <sup>a</sup>   | 0.0  | 47.0   | 53.0  | 0.0   |
| Ohio                        | 0.3  | 0.3  | 91.8  | 7.9   |
| Oklahoma                    | 0.0  | 0.0  | 99.7  | 0.3   |
| Oregon                      | 0.0  | 0.0  | 99.9  | 0.1   |
| Pennsylvania                | 0.0  | 0.0  | 99.9  | 0.1   |
| Puerto Rico                 | 0.0  | 0.0  | 99.6  | 0.4   |
| Rhode Island                | 0.0  | 0.0  | 98.1  | 1.9   |
| South Carolina              | 0.0  | 0.0  | 99.8  | 0.2   |
| South Dakota                | 0.0  | 0.3  | 99.4  | 0.3   |
| Tennessee                   | 0.0  | 1.8  | 95.9  | 2.3   |
| Texas <sup>a</sup>          | 0.0  | 61.2   | 38.8  | 0.0   |
| Utah                        | 0.0  | 0.0  | 100.0   | 0.0   |
| Vermont                     | 0.0  | 0.0  | 99.0  | 1.0   |
| Virgin Islands <sup>a</sup> | 0.0  | 74.3   | 25.7  | 0.0   |
| Virginia                    | 0.0  | 0.1  | 99.3  | 0.7   |
| Washington                  | 0.0  | 12.2   | 87.8  | 0.0   |
| West Virginia <sup>a</sup>  | 0.0  | 49.6   | 50.4  | 0.0   |
| Wisconsin                   | 0.0  | 1.3  | 98.5  | 0.2   |
| Wyoming <sup>a</sup>        | 0.0  | 55.1   | 44.9  | 0.0   |
| <b>All reported areas</b>   | <b>0.3</b>                                       | <b>19.1</b>  | <b>79.6</b>   | <b>1.2</b>  |

<sup>a</sup> Connecticut, Florida, Hawaii, Maryland, Massachusetts, Minnesota, North Dakota, Texas, Virgin Islands, West Virginia, and Wyoming submitted information for head of household only.

<sup>b</sup> Does not include tenant data from suballocators in Illinois or New York.

Across all reported households, 79.6 percent of household records included information for the same number of household members as household size, so reported on all household members. Most of the remaining reported households, 19.1 percent, included information for less than the reported household size at certification, suggesting incomplete coverage of household members, and 1.2 percent reported more household members than present at certification.

Household member information from 11 states was incomplete for more than 40 percent of reported households, usually because information was reported for only the head of the household.<sup>17</sup> These states are shaded gray in table 2. The complete coverage of household members will be relevant for tables reporting demographic and compositional characteristics, in particular the presence of children, seniors, and household members who are disabled.

In addition to varying in terms of coverage (for example, whether all properties, units, or tenants are included), *completeness* also varies across the requested information, such as race, disability status, age, or use of rental assistance. The presentation of each set of information is accompanied by an account of missing data for the variables relevant for that table. In general, data are most complete for information that states have historically collected as part of LIHTC Program compliance; newer items that do not affect program eligibility may have lower coverage and may well not have been reviewed by states before submitting to HUD. HUD performs data quality checks and communicates directly with states to address data issues, which usually occurs through the next year's submission of data.

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<sup>17</sup> Alaska could not be evaluated because, although the Alaska Housing Finance Corporation submitted multiple members per household, it did not provide household size at certification.



## V. HUD's 2013 Collection of LIHTC Tenant Information

### A. Race by Ethnicity

HUD's LIHTC Tenant Data Collection Form requests race according to standards set by OMB and also used by HUD's rental assistance and multifamily housing programs. Although most of the information requested on the HUD LIHTC Tenant Data Collection Form is required and necessary for program compliance by the state housing finance agencies, race and ethnicity are not. Before the Housing and Economic Recovery Act-mandated HUD collection, many states did not collect any race and ethnicity information, and others collected similar information using different categories or standards. The incorporation, or modification, of race and ethnicity into states' TIC forms caused a delay in their ability to report this information to HUD. This delay was caused in part by the process of amending the state TIC forms to request this information but also by the need to collect this new information from all low-income housing tax credit tenants because many states did not have this information, unlike compliance information such as income and rent, for any tenants.

Race and ethnicity are requested for each household member. As explained in the previous section, data submitted at the individual level suffer from underreporting of properties, units, and household members. Further, in accordance with fair housing laws, tenants are not required to report their race or ethnicity. Restating information presented in section IV, seven states (Alaska, Illinois, Louisiana, Minnesota, New Jersey, New York, Oregon, and Washington) submitted information for a fairly small percentage of their active LIHTC property stock. Also, as previously mentioned, HUD did not receive information for LIHTC tenants in Chicago or New York City, accounting for the bulk of unreported units for their states.

For the households and units reported, many suffered from an underreporting of household members. Recall from table 2 that few states reported all members of each LIHTC household, and eight states (Florida, Hawaii, Massachusetts, Minnesota, Texas, Virgin Islands, West Virginia, and Wyoming) submitted all household members for less than one-half of their *reported* occupied units. The underreporting of household members across states lead to the decision to include only tabulations of heads of household for race and ethnicity and several other tabulations presented subsequently in this report.<sup>18</sup>

Table 3 shows the percentage of reported heads of household for whom race and ethnicity were submitted to HUD. The first column repeats the percentage of properties reported from table 1 in order to provide perspective on the completeness for the entire active LIHTC stock in each state.<sup>19</sup> Two states, North Dakota and Texas, did not provide race or ethnicity information for any heads of household.<sup>20</sup> In addition, Arizona, Florida, Pennsylvania, and Washington did not provide sufficient information on both race and ethnicity to include in tabulations for this report.

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<sup>18</sup> Included in these tabulations are household members who are not reported as heads but are the only reported household members. Also, if a head of household is not indicated, the first member reported on the submitted form is included in these tabulations.

<sup>19</sup> For example, although the Alaska HFC submitted both race and ethnicity data for 92.2 percent of reported heads of household, the tenant data for Alaska includes only 20.0 percent of its LIHTC stock.

<sup>20</sup> Texas collects race and ethnicity information according to different standards. For Texas state tabulations, see <http://www.tdhca.state.tx.us/housing-center/docs/12-HSR.pdf>.

**Table 3. Race and Ethnicity of Heads of Household**

| State                     | Properties Reported (%)  | Non-Hispanic    |                                     |                 |   |  |                                     | Hispanic (Any Race) (%) | Race or Ethnicity Not Reported (%) | Total (%)    |
|---------------------------|--------------------------|-----------------|-------------------------------------|-----------------|---|--|-------------------------------------|-------------------------|------------------------------------|--------------|
|                           |                          | White Alone (%) | Black or African American Alone (%) | Asian Alone (%) | American Indian and Alaska Native Alone (%) | Native Hawaiian and Other Pacific Islander Alone (%) | Other (Including Multiple Race) (%) |                         |                                    |              |
| Alabama                   | 47.1                     | 18.1            | 32.3                                | 0.3             | 0.0   | 0.0  | 0.1                                 | 0.7                     | 48.4                               | 100.0        |
| Alaska                    | 20.0                     | 39.4            | 14.2                                | 3.6             | 25.3  | 4.1  | 0.0                                 | 5.6                     | 7.8                                | 100.0        |
| Arizona                   | 71.3                     | 0.0             | 0.0                                 | 0.0             | 0.0   | 0.0  | 0.0                                 | 0.0                     | 100.0                              | 100.0        |
| Arkansas                  | 63.4                     | 43.4            | 49.3                                | 0.4             | 0.3   | 0.3  | 1.4                                 | 2.6                     | 2.3                                | 100.0        |
| California                | 82.3                     | 19.8            | 12.1                                | 8.1             | 0.5   | 0.4  | 1.5                                 | 27.1                    | 30.5                               | 100.0        |
| Colorado                  | 77.3                     | 34.3            | 10.1                                | 1.8             | 0.9   | 0.2  | 1.5                                 | 19.5                    | 31.6                               | 100.0        |
| Connecticut               | 69.1                     | 31.1            | 22.3                                | 0.4             | 0.1   | 0.2  | 1.5                                 | 23.7                    | 20.6                               | 100.0        |
| Delaware                  | 90.2                     | 26.5            | 60.5                                | 0.5             | 0.5   | 0.2  | 1.2                                 | 6.9                     | 3.6                                | 100.0        |
| District of Columbia      | <i>Data Not Reported</i> |                 |                                     |                 |   |  |                                     |                         |                                    |              |
| Florida                   | 72.8                     | 0.0             | 0.0                                 | 0.0             | 0.0   | 0.0  | 0.0                                 | 0.0                     | 100.0                              | 100.0        |
| Georgia                   | 64.0                     | 16.7            | 64.6                                | 1.2             | 0.2   | 0.1  | 1.2                                 | 2.6                     | 13.5                               | 100.0        |
| Guam                      | 100.0                    | 6.0             | 1.4                                 | 26.4            | 0.2   | 63.9   | 0.2                                 | 0.2                     | 1.4                                | 100.0        |
| Hawaii                    | 91.7                     | 13.8            | 1.1                                 | 24.9            | 0.6   | 17.7   | 3.0                                 | 5.8                     | 33.2                               | 100.0        |
| Idaho                     | 100.0                    | 67.1            | 1.3                                 | 0.8             | 1.5   | 0.2  | 0.7                                 | 7.4                     | 21.0                               | 100.0        |
| Illinois <sup>a</sup>     | 42.4                     | 35.6            | 25.1                                | 0.2             | 0.2   | 0.2  | 1.1                                 | 3.1                     | 34.6                               | 100.0        |
| Indiana                   | 63.3                     | 47.9            | 38.6                                | 0.0             | 0.3   | 0.2  | 1.2                                 | 0.7                     | 11.1                               | 100.0        |
| Iowa                      | 70.0                     | 43.4            | 10.2                                | 0.7             | 0.4   | 0.2  | 0.8                                 | 2.2                     | 42.2                               | 100.0        |
| Kansas                    | 74.3                     | 53.6            | 18.6                                | 0.7             | 0.5   | 0.1  | 2.1                                 | 2.4                     | 22.1                               | 100.0        |
| Kentucky                  | 74.7                     | 83.2            | 16.5                                | 0.1             | 0.1   | 0.0  | 0.0                                 | 0.0                     | 0.0                                | 100.0        |
| Louisiana                 | 38.2                     | 12.4            | 62.2                                | 0.2             | 0.2   | 0.0  | 4.5                                 | 1.2                     | 19.4                               | 100.0        |
| Maine                     | 64.2                     | 75.4            | 8.4                                 | 1.1             | 1.1   | 0.1  | 3.5                                 | 1.6                     | 8.9                                | 100.0        |
| Maryland                  | 62.0                     | 19.1            | 40.8                                | 1.4             | 0.3   | 0.1  | 0.6                                 | 5.7                     | 32.0                               | 100.0        |
| Massachusetts             | 66.9                     | 28.1            | 16.6                                | 4.9             | 0.3   | 0.0  | 1.1                                 | 25.9                    | 23.0                               | 100.0        |
| Michigan                  | 67.9                     | 31.7            | 26.6                                | 0.5             | 0.3   | 0.0  | 0.8                                 | 1.8                     | 38.2                               | 100.0        |
| Minnesota                 | 40.7                     | 53.4            | 30.3                                | 2.4             | 2.5   | 0.2  | 0.8                                 | 3.3                     | 6.9                                | 100.0        |
| Mississippi               | 88.6                     | 12.6            | 65.3                                | 0.5             | 0.2   | 0.1  | 1.9                                 | 0.8                     | 18.7                               | 100.0        |
| Missouri                  | 47.9                     | 48.8            | 32.8                                | 0.4             | 0.2   | 0.1  | 1.5                                 | 1.9                     | 14.4                               | 100.0        |
| Montana                   | 81.9                     | 69.7            | 0.8                                 | 0.4             | 9.0   | 0.1  | 1.7                                 | 2.7                     | 15.6                               | 100.0        |
| Nebraska                  | 97.5                     | 37.5            | 14.5                                | 0.5             | 0.6   | 0.1  | 1.5                                 | 4.1                     | 41.2                               | 100.0        |
| Nevada                    | 69.4                     | 31.9            | 13.2                                | 1.5             | 0.5   | 0.6  | 2.0                                 | 19.8                    | 30.5                               | 100.0        |
| New Hampshire             | 51.9                     | 66.0            | 3.1                                 | 0.6             | 0.2   | 0.0  | 16.0                                | 3.8                     | 10.2                               | 100.0        |
| New Jersey                | 33.2                     | 21.3            | 35.6                                | 0.8             | 0.3   | 0.1  | 0.8                                 | 7.8                     | 33.3                               | 100.0        |
| New Mexico                | <i>Data Not Reported</i> |                 |                                     |                 |   |  |                                     |                         |                                    |              |
| New York <sup>a</sup>     | 34.2                     | 27.2            | 18.6                                | 0.6             | 0.1   | 0.1  | 0.5                                 | 8.1                     | 44.7                               | 100.0        |
| North Carolina            | 72.0                     | 29.8            | 58.9                                | 0.6             | 1.0   | 0.3  | 0.0                                 | 3.7                     | 5.8                                | 100.0        |
| North Dakota              | 93.6                     | 0.0             | 0.0                                 | 0.0             | 0.0   | 0.0  | 0.0                                 | 0.0                     | 100.0                              | 100.0        |
| Ohio                      | 71.9                     | 34.7            | 37.3                                | 0.2             | 0.2   | 0.0  | 0.1                                 | 2.2                     | 25.3                               | 100.0        |
| Oklahoma                  | 57.4                     | 56.5            | 20.3                                | 0.5             | 6.6   | 0.2  | 2.8                                 | 4.3                     | 8.8                                | 100.0        |
| Oregon                    | 5.4                      | 68.0            | 5.2                                 | 1.4             | 1.4   | 0.3  | 1.9                                 | 8.8                     | 13.0                               | 100.0        |
| Pennsylvania              | 88.9                     | 0.0             | 0.0                                 | 0.0             | 0.0   | 0.0  | 0.0                                 | 4.9                     | 95.1                               | 100.0        |
| Puerto Rico               | 76.5                     | 0.2             | 0.1                                 | 0.0             | 0.0   | 0.0  | 0.3                                 | 84.3                    | 15.2                               | 100.0        |
| Rhode Island              | 64.7                     | 54.8            | 14.4                                | 0.7             | 1.3   | 0.1  | 3.2                                 | 17.3                    | 8.1                                | 100.0        |
| South Carolina            | 44.0                     | 22.1            | 59.2                                | 0.3             | 0.2   | 0.0  | 1.3                                 | 3.3                     | 13.6                               | 100.0        |
| South Dakota              | 69.3                     | 53.6            | 3.9                                 | 0.8             | 17.7  | 0.2  | 3.9                                 | 2.2                     | 17.8                               | 100.0        |
| Tennessee                 | 45.9                     | 35.4            | 46.4                                | 0.2             | 0.1   | 0.1  | 0.3                                 | 0.4                     | 17.0                               | 100.0        |
| Texas                     | 51.4                     | 0.0             | 0.0                                 | 0.0             | 0.0   | 0.0  | 0.0                                 | 0.0                     | 100.0                              | 100.0        |
| Utah                      | 84.6                     | 42.4            | 2.1                                 | 0.9             | 1.0   | 0.6  | 2.0                                 | 4.7                     | 46.3                               | 100.0        |
| Vermont                   | 55.2                     | 79.8            | 3.1                                 | 1.2             | 0.3   | 0.0  | 10.1                                | 1.4                     | 4.0                                | 100.0        |
| Virgin Islands            | 79.2                     | 0.9             | 55.8                                | 0.1             | 0.0   | 0.0  | 0.4                                 | 13.0                    | 29.8                               | 100.0        |
| Virginia                  | 75.5                     | 23.0            | 47.2                                | 2.3             | 0.4   | 0.1  | 4.8                                 | 7.7                     | 14.4                               | 100.0        |
| Washington                | 1.5                      | 0.0             | 0.0                                 | 0.0             | 0.0   | 0.0  | 0.0                                 | 0.0                     | 100.0                              | 100.0        |
| West Virginia             | 79.0                     | 79.9            | 14.1                                | 0.3             | 0.2   | 0.1  | 0.1                                 | 1.2                     | 4.1                                | 100.0        |
| Wisconsin                 | 58.1                     | 51.0            | 20.6                                | 1.0             | 1.5   | 0.1  | 0.6                                 | 3.9                     | 21.4                               | 100.0        |
| Wyoming                   | 67.3                     | 52.6            | 1.3                                 | 0.2             | 1.1   | 0.1  | 0.2                                 | 6.2                     | 38.3                               | 100.0        |
| <b>All reported areas</b> | <b>58.9</b>              | <b>23.4</b>     | <b>21.4</b>                         | <b>1.8</b>      | <b>0.5</b>                                  | <b>0.2</b>   | <b>1.1</b>                          | <b>8.1</b>              | <b>43.5</b>                        | <b>100.0</b> |

<sup>a</sup> Does not include tenant data from suballocators in Illinois or New York.

The six states mentioned with insufficient data and the two states that did not report tenant data—the District of Columbia and New Mexico—are presented in gray in table 3. Overall, the combination of race and ethnicity were not provided for 43.5 percent of reported heads of household, either because the tenant chose not to respond or the data were not collected. Nearly one-fourth (23.4 percent) of reported LIHTC heads of household are non-Hispanic/White and slightly more than one-fifth (21.4 percent) are non-Hispanic/Black. Slightly less than one-tenth (8.1 percent) of heads are Hispanic. Although other minority categories represent less than 4 percent nationwide, they comprise a significant percentage in certain states. For example, non-Hispanic/Asian heads of household account for one-fourth of LIHTC heads in Guam and Hawaii. Non-Hispanic/Native Hawaiian and Other Pacific Islander heads also comprise a significant share in Guam and Hawaii. Non-Hispanic/American Indian and Alaska Native heads of household represent one-fourth of the households in Alaska and 17.7 percent in South Dakota.

### ***B. Disability Status***

Tenant disability status is collected in accordance with the Fair Housing Act’s definition of handicapped. A tenant’s response, or nonresponse, does not affect the tenant’s ability to claim disability benefits or to request handicapped-accessible features in the LIHTC unit. The Fair Housing Act defines a disability as a physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or being regarded as having such an impairment. Definitions of physical and mental impairment are found in *24 CFR 100.201*. In compliance with the Fair Housing Act, tenants are not required to respond to this question.

Before the HERA data collection mandate, few states collected tenant disability status for the head of household or other household members. Thus, nearly all HFAs had to amend their TIC forms to request this information, which delayed their ability to report to HUD. Missing data or data coverage of disability status was similar to those for race and ethnicity, both of which are newly collected information that is not used for programmatic purposes. Similar to all LIHTC tenant data, this information suffers from potential incomplete coverage of properties, units, and household members. As explained previously, data from seven states (Alaska, Illinois, Louisiana, Minnesota, New Jersey, New York, Oregon, and Washington) covered a fairly small percentage of their active LIHTC properties. In addition, the District of Columbia and New Mexico, and suballocators in Chicago and New York City, did not submit any tenant data. The reported information for most states did not contain all household members, further limiting HUD’s ability to report disability status.

### ***Households***

Table 4 provides household-level information on the presence of at least one disabled tenant. The first column (Percent of Properties Reported) repeats data from table 1. This column is included to enhance understanding of the coverage of properties in the state data. Connecticut, Florida, Hawaii, Maryland, Massachusetts, Minnesota, North Dakota, Texas, Virgin Islands, West Virginia, and Wyoming—highlighted in gray—provided disability status for only the head of household.<sup>21</sup>

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<sup>21</sup> For reporting purposes, a household member who is not reported as the head of household, but who is the only reported member in the unit, is considered the head of household in tabulations.

**Table 4. LIHTC Households With Disabled Members**

| State                     | Properties Reported (%) | All Household Members Reported <sup>a</sup> (%) | Disability Status Reported for At Least One Member (%) | At Least One Member Reported As Disabled (%) |
|---------------------------|-------------------------|---|--|--|
| Alabama                   | 47.1                    | 85.8  | 100.0  | 8.4  |
| Alaska                    | 20.0                    | <i>Data Not Reported</i>                        | 99.4   | 20.7   |
| Arizona                   | 71.3                    | 97.7  | 100.0  | 16.3   |
| Arkansas                  | 63.4                    | 99.2  | 100.0  | 8.3  |
| California                | 82.3                    | 99.5  | 93.3   | 7.0  |
| Colorado                  | 77.3                    | 84.6  | 82.9   | 2.5  |
| Connecticut               | 69.1                    | 51.4  | 100.0  | 6.3  |
| Delaware                  | 90.2                    | 100.0   | 100.0  | 3.4  |
| District of Columbia      |                         | <i>Data Not Reported</i>                        |  |  |
| Florida                   | 72.8                    | 33.4  | 100.0  | 0.0  |
| Georgia                   | 64.0                    | 100.0   | 100.0  | 1.4  |
| Guam                      | 100.0                   | 96.6  | 98.8   | 1.2  |
| Hawaii                    | 91.7                    | 46.8  | 100.0  | 3.5  |
| Idaho                     | 100.0                   | 94.5  | 96.6   | 20.4   |
| Illinois <sup>b</sup>     | 42.4                    | 79.2  | 100.0  | 3.3  |
| Indiana                   | 63.3                    | 56.4  | 99.9   | 9.7  |
| Iowa                      | 70.0                    | 95.5  | 68.7   | 6.7  |
| Kansas                    | 74.3                    | 100.0   | 100.0  | 5.6  |
| Kentucky                  | 74.7                    | 91.7  | 100.0  | 0.0  |
| Louisiana                 | 38.2                    | 98.0  | 100.0  | 2.5  |
| Maine                     | 64.2                    | 99.5  | 100.0  | 12.4   |
| Maryland                  | 62.0                    | 57.4  | 100.0  | 4.1  |
| Massachusetts             | 66.9                    | 48.3  | 100.0  | 10.0   |
| Michigan                  | 67.9                    | 99.0  | 61.7   | 4.3  |
| Minnesota                 | 40.7                    | 39.2  | 98.9   | 8.3  |
| Mississippi               | 88.6                    | 98.6  | 71.1   | 5.7  |
| Missouri                  | 47.9                    | 98.5  | 82.9   | 6.3  |
| Montana                   | 81.9                    | 99.7  | 98.3   | 15.6   |
| Nebraska                  | 97.5                    | 97.8  | 83.1   | 5.4  |
| Nevada                    | 69.4                    | 98.9  | 88.4   | 5.5  |
| New Hampshire             | 51.9                    | 99.3  | 100.0  | 5.4  |
| New Jersey                | 33.2                    | 100.0   | 100.0  | 3.7  |
| New Mexico                |                         | <i>Data Not Reported</i>                        |  |  |
| New York <sup>b</sup>     | 34.2                    | 79.5  | 58.0   | 12.5   |
| North Carolina            | 72.0                    | 74.7  | 100.0  | 12.3   |
| North Dakota              | 93.6                    | 53.0  | 75.2   | 0.0  |
| Ohio                      | 71.9                    | 91.8  | 19.0   | 5.7  |
| Oklahoma                  | 57.4                    | 99.7  | 68.4   | 5.0  |
| Oregon                    | 5.4                     | 99.9  | 100.0  | 7.8  |
| Pennsylvania              | 88.9                    | 99.9  | 7.7  | 7.7  |
| Puerto Rico               | 76.5                    | 99.6  | 100.0  | 4.7  |
| Rhode Island              | 64.7                    | 98.1  | 100.0  | 30.8   |
| South Carolina            | 44.0                    | 99.8  | 100.0  | 2.1  |
| South Dakota              | 69.3                    | 99.4  | 100.0  | 8.9  |
| Tennessee                 | 45.9                    | 95.9  | 100.0  | 6.2  |
| Texas                     | 51.4                    | 38.8  | 0.0  | <i>Data Not Reported</i>                     |
| Utah                      | 84.6                    | 100.0   | 100.0  | 3.2  |
| Vermont                   | 55.2                    | 99.0  | 100.0  | 15.4   |
| Virgin Islands            | 79.2                    | 25.7  | 100.0  | 1.6  |
| Virginia                  | 75.5                    | 99.3  | 100.0  | 3.9  |
| Washington                | 1.5                     | 87.8  | 29.7   | 19.0   |
| West Virginia             | 79.0                    | 50.4  | 100.0  | 18.6   |
| Wisconsin                 | 58.1                    | 98.5  | 89.3   | 10.5   |
| Wyoming                   | 67.3                    | 44.9  | 100.0  | 9.1  |
| <b>All reported areas</b> | <b>58.9</b>             | <b>79.6</b>                                     | <b>76.1</b>  | <b>6.4</b>                                   |

<sup>a</sup> The percentage of occupied units in which reported household members equal reported household size at certification.

<sup>b</sup> Does not include tenant data from suballocators in Illinois or New York.

Overall, approximately three-fourths of reported households include disability status for at least one household member. The reporting of disability status, however, varied across states. Nearly one-half of states (27) reported disability status for at least one member of each household, and more than one-half (37 states) reported this information for more than 90 percent of households. Four states (Ohio, Pennsylvania, Texas, and Washington), however, reported this information for fewer than 30 percent of their reported households.

The data quality of disability status, however, remains the most uncertain of all the required information. For example, Florida, Kentucky, and North Dakota reported disability status for at least one household member across all or most LIHTC households. None of their tenants were reported as disabled, however. This discrepancy could be in part a result of the underreporting of all household members, which is 33.4 percent for Florida and 53.0 percent in North Dakota; underreporting of units may also play a role. With all the coverage and data quality caveats in mind, 6.4 percent of reported LIHTC households in the nation have at least one disabled member. Excluding Florida, Kentucky, and North Dakota, 7.3 percent of reported LIHTC households in the nation have at least one disabled member.

Considerable variation among states is evident in each of these statistics. It is not clear, however, whether all this variation reflects true differences in populations served or data issues. In particular, state disability rates several times larger than the national average may reflect true variation in who is served or may be because of underreporting in many states with particularly low shares of households containing a disabled member. Alaska (20.7 percent), Arizona (16.3 percent), Idaho (20.4 percent), Rhode Island (30.8 percent), Washington (19.0 percent), and West Virginia (18.6 percent) reported serving the highest percentages of households with at least one reported disabled member.

### ***Household Members***

Table 5 reports disability status at the individual household member level. The first column (Percent of Properties Reported) repeats data from table 1. The second column (All Household Members Reported) contains data from table 4. The last two columns present strictly individual-level information, beginning with the share of reported individuals in that state for whom disability status is known. Overall, disability status is reported for 77.7 percent of reported individuals in the tenant data. For these people, 4.4 percent are reported as disabled. As discussed previously, data quality is a concern for several states. Florida, Kentucky, and North Dakota did not report any tenants as disabled. Ohio, Pennsylvania, and Washington reported a very high percentage of tenants as disabled but reported on less than 30 percent of tenants. In fact, Ohio and Pennsylvania reported on disability status for less than 10 percent of tenants. These outliers do not have a great effect on the national total, however. Excluding all 6 of these states from the national total yields a national disability rate of LIHTC tenants of 4.3 percent. Finally, the 11 states that reported information for only the head of household are highlighted in gray.

**Table 5. Disability Status of Individual Household Members**

| State                     | Properties Reported (%)  | All Household Members Reported <sup>a</sup> (% of Households) | Individuals For Whom Disability Status Is Reported (% of Individuals) | Reported As Disabled (% of Individuals) |
|---------------------------|--------------------------|---|---|---|
| Alabama                   | 47.1                     | 85.8  | 100.0   | 4.2                                     |
| Alaska                    | 20.0                     | <i>Data Not Reported</i>                                      | 97.2  | 7.9                                     |
| Arizona                   | 71.3                     | 97.7  | 100.0   | 6.7                                     |
| Arkansas                  | 63.4                     | 99.2  | 100.0   | 4.1                                     |
| California                | 82.3                     | 99.5  | 91.6  | 3.2                                     |
| Colorado                  | 77.3                     | 84.6  | 85.4  | 1.4                                     |
| Connecticut               | 69.1                     | 51.4  | 95.8  | 6.3                                     |
| Delaware                  | 90.2                     | 100.0   | 100.0   | 1.7                                     |
| District of Columbia      | <i>Data Not Reported</i> |   |   |   |
| Florida                   | 72.8                     | 33.4  | 94.0  | 0.0                                     |
| Georgia                   | 64.0                     | 100.0   | 100.0   | 0.8                                     |
| Guam                      | 100.0                    | 96.6  | 96.9  | 0.3                                     |
| Hawaii                    | 91.7                     | 46.8  | 98.0  | 3.5                                     |
| Idaho                     | 100.0                    | 94.5  | 90.8  | 10.9                                    |
| Illinois <sup>b</sup>     | 42.4                     | 79.2  | 100.0   | 2.3                                     |
| Indiana                   | 63.3                     | 56.4  | 99.9  | 4.6                                     |
| Iowa                      | 70.0                     | 95.5  | 67.7  | 5.7                                     |
| Kansas                    | 74.3                     | 100.0   | 100.0   | 3.1                                     |
| Kentucky                  | 74.7                     | 91.7  | 100.0   | 0.0                                     |
| Louisiana                 | 38.2                     | 98.0  | 100.0   | 1.2                                     |
| Maine                     | 64.2                     | 99.5  | 100.0   | 6.6                                     |
| Maryland                  | 62.0                     | 57.4  | 96.2  | 4.1                                     |
| Massachusetts             | 66.9                     | 48.3  | 97.3  | 10.0                                    |
| Michigan                  | 67.9                     | 99.0  | 60.3  | 4.1                                     |
| Minnesota                 | 40.7                     | 39.2  | 96.6  | 8.4                                     |
| Mississippi               | 88.6                     | 98.6  | 71.1  | 3.7                                     |
| Missouri                  | 47.9                     | 98.5  | 82.8  | 4.4                                     |
| Montana                   | 81.9                     | 99.7  | 98.4  | 9.0                                     |
| Nebraska                  | 97.5                     | 97.8  | 82.1  | 3.5                                     |
| Nevada                    | 69.4                     | 98.9  | 86.9  | 3.3                                     |
| New Hampshire             | 51.9                     | 99.3  | 100.0   | 2.7                                     |
| New Jersey                | 33.2                     | 100.0   | 100.0   | 2.2                                     |
| New Mexico                | <i>Data Not Reported</i> |   |   |   |
| New York <sup>b</sup>     | 34.2                     | 79.5  | 66.7  | 13.5                                    |
| North Carolina            | 72.0                     | 74.7  | 96.0  | 6.9                                     |
| North Dakota              | 93.6                     | 53.0  | 75.9  | 0.0                                     |
| Ohio                      | 71.9                     | 91.8  | 9.7   | 30.1                                    |
| Oklahoma                  | 57.4                     | 99.7  | 68.4  | 4.0                                     |
| Oregon                    | 5.4                      | 99.9  | 100.0   | 3.4                                     |
| Pennsylvania              | 88.9                     | 99.9  | 4.5   | 100.0                                   |
| Puerto Rico               | 76.5                     | 99.6  | 100.0   | 2.3                                     |
| Rhode Island              | 64.7                     | 98.1  | 100.0   | 18.7                                    |
| South Carolina            | 44.0                     | 99.8  | 100.0   | 1.1                                     |
| South Dakota              | 69.3                     | 99.4  | 100.0   | 4.0                                     |
| Tennessee                 | 45.9                     | 95.9  | 100.0   | 3.1                                     |
| Texas                     | 51.4                     | 38.8  | 0.0   | <i>Data Not Reported</i>                |
| Utah                      | 84.6                     | 100.0   | 100.0   | 1.4                                     |
| Vermont                   | 55.2                     | 99.0  | 100.0   | 9.3                                     |
| Virgin Islands            | 79.2                     | 25.7  | 98.3  | 1.6                                     |
| Virginia                  | 75.5                     | 99.3  | 100.0   | 1.9                                     |
| Washington                | 1.5                      | 87.8  | 26.3  | 42.5                                    |
| West Virginia             | 79.0                     | 50.4  | 93.9  | 18.6                                    |
| Wisconsin                 | 58.1                     | 98.5  | 86.2  | 8.0                                     |
| Wyoming                   | 67.3                     | 44.9  | 94.9  | 9.1                                     |
| <b>All reported areas</b> | <b>58.9</b>              | <b>79.6</b>   | <b>77.7</b>   | <b>4.4</b>                              |

<sup>a</sup> Reported household members equal reported household size at certification.

<sup>b</sup> Does not include tenant data from suballocators in Illinois or New York.

### **C. Family Composition and Age**

HUD's LIHTC Tenant Data Collection Form requests relationship to head and date of birth for each household member. Relationship to head is used for program income determination because income from certain household members (for example, all income of live-in aides and earned income of dependents) does not count toward annual household income. Some states did not collect date of birth for all LIHTC tenants before the HERA mandate, instead opting to collect number of household members by age group. Thus, although similar information was collected, this information also required a change in some states' TIC forms.

Many states use the LIHTC Program to address affordable housing shortages for families and seniors specifically. Thus, family composition and age are reported together, highlighting households with children and elderly members. HUD reports family composition based on age of household members and the relationship to the head of household. The LIHTC Tenant Data Collection Form requests date of birth and relationship to head of household for each tenant in an LIHTC unit. The date of birth is used to determine the age of tenants as of the reporting date, December 31, 2012. The relationship to head of household is used primarily to identify the head for elderly-headed households.<sup>22</sup>

Identifying the presence of children or seniors in households requires having valid dates of birth for all household members. As reported previously, in order to determine whether all household members are reported, HUD compared the number of reported members, for whom date of birth and other information is requested, with the reported household size at certification. The first three columns of table 6 provide information on data coverage of household members and date of birth. All or most household members were reported for nearly two-thirds of states. In addition, nearly two-thirds of HFAs submitted complete or nearly complete information on date of birth for all household members. Overall, in 68 percent of reported units, date of birth was provided for at least one household member.

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<sup>22</sup> Although relationship to head of household could be used to identify children of the household head, this variable suffers from the same coverage issues as date of birth.

**Table 6. Family Composition: Households With Children and Elderly Members**

| State                     | All Household Members Reported (%) | Valid Date of Birth Provided for |                          | At Least One Member < 18 (%)       | At Least One Member >= 62 (%) | Reported Head of Household >= 62 (%) |
|---------------------------|------------------------------------|----------------------------------|--------------------------|------------------------------------|-------------------------------|--------------------------------------|
|                           |                                    | Head of Household (%)            | All Reported Members (%) |                                    |                               |                                      |
| Alabama                   | 85.8                               | 99.5                             | 99.4                     | 40.8                               | 28.1                          | 27.3                                 |
| Alaska                    | <i>Not Reported</i>                | 99.8                             | 98.8                     | 52.5                               | 25.0                          | 23.1                                 |
| Arizona                   | 97.7                               | 98.9                             | 97.9                     | 48.9                               | 24.3                          | 22.6                                 |
| Arkansas                  | 99.2                               | 97.0                             | 96.1                     | 42.3                               | 25.1                          | 23.8                                 |
| California                | 99.5                               | 99.5                             | 98.9                     | 41.3                               | 35.9                          | 33.7                                 |
| Colorado                  | 84.6                               | 93.3                             | 92.4                     | 38.2                               | 27.3                          | 25.8                                 |
| Connecticut               | 51.4                               | <i>Data Not Reported</i>         |                          |                                    |                               |                                      |
| Delaware                  | 100.0                              | 99.8                             | 92.9                     | 42.3                               | 32.9                          | 26.0                                 |
| District of Columbia      | <i>Data Not Reported</i>           |                                  |                          |                                    |                               |                                      |
| Florida                   | 33.4                               | <i>Data Not Reported</i>         |                          |                                    |                               |                                      |
| Georgia                   | 100.0                              | 97.5                             | 91.9                     | 37.1                               | 32.2                          | 26.6                                 |
| Guam                      | 96.6                               | 98.6                             | 95.9                     | 80.0                               | 12.7                          | 6.5                                  |
| Hawaii                    | 46.8                               | <i>Data Not Reported</i>         |                          |                                    |                               |                                      |
| Idaho                     | 94.5                               | 97.5                             | 92.9                     | 39.6                               | 28.9                          | 24.7                                 |
| Illinois <sup>a</sup>     | 79.2                               | 68.9                             | 68.9                     | <i>Data Suppressed<sup>b</sup></i> | 30.8                          | 30.6                                 |
| Indiana                   | 56.4                               | 99.9                             | 99.3                     | 44.3                               | 23.7                          | 23.0                                 |
| Iowa                      | 95.5                               | 100.0                            | 99.4                     | 31.8                               | 28.5                          | 27.5                                 |
| Kansas                    | 100.0                              | 96.6                             | 82.2                     | 26.4                               | 41.4                          | 28.5                                 |
| Kentucky                  | 91.7                               | 98.2                             | 96.7                     | 39.4                               | 27.0                          | 25.8                                 |
| Louisiana                 | 98.0                               | 92.6                             | 92.3                     | 48.7                               | 16.9                          | 16.1                                 |
| Maine                     | 99.5                               | 96.9                             | 96.6                     | 34.1                               | 35.9                          | 34.6                                 |
| Maryland                  | 57.4                               | <i>Data Not Reported</i>         |                          |                                    |                               |                                      |
| Massachusetts             | 48.3                               | <i>Data Not Reported</i>         |                          |                                    |                               |                                      |
| Michigan                  | 99.0                               | 100.0                            | 98.3                     | 31.6                               | 36.1                          | 34.4                                 |
| Minnesota                 | 39.2                               | 96.5                             | 96.5                     | <i>Data Suppressed<sup>b</sup></i> | 18.6                          | 18.6                                 |
| Mississippi               | 98.6                               | 99.8                             | 99.2                     | 51.8                               | 16.8                          | 15.9                                 |
| Missouri                  | 98.5                               | 100.0                            | 99.2                     | 32.8                               | 31.7                          | 30.7                                 |
| Montana                   | 99.7                               | 99.9                             | 99.3                     | 31.6                               | 34.8                          | 34.5                                 |
| Nebraska                  | 97.8                               | 99.9                             | 98.5                     | 40.0                               | 27.6                          | 25.8                                 |
| Nevada                    | 98.9                               | 100.0                            | 99.6                     | 35.3                               | 36.2                          | 34.8                                 |
| New Hampshire             | 99.3                               | 95.9                             | 95.5                     | 38.8                               | 35.2                          | 34.0                                 |
| New Jersey                | 100.0                              | 94.1                             | 87.7                     | 27.1                               | 47.8                          | 42.1                                 |
| New Mexico                | <i>Data Not Reported</i>           |                                  |                          |                                    |                               |                                      |
| New York <sup>a</sup>     | 79.5                               | 51.1                             | 50.7                     | <i>Data Suppressed<sup>b</sup></i> | 22.9                          | 22.3                                 |
| North Carolina            | 74.7                               | 99.6                             | 98.2                     | 37.4                               | 32.8                          | 31.1                                 |
| North Dakota              | 53.0                               | <i>Data Not Reported</i>         |                          |                                    |                               |                                      |
| Ohio                      | 91.8                               | 91.4                             | 44.3                     | <i>Data Suppressed<sup>b</sup></i> | 73.9                          | 32.0                                 |
| Oklahoma                  | 99.7                               | 99.3                             | 98.3                     | 39.5                               | 32.4                          | 31.3                                 |
| Oregon                    | 99.9                               | 99.7                             | 99.6                     | 34.4                               | 23.7                          | 22.8                                 |
| Pennsylvania              | 99.9                               | 99.9                             | 99.7                     | 30.5                               | 47.4                          | 46.7                                 |
| Puerto Rico               | 99.6                               | 100.0                            | 99.3                     | 44.2                               | 38.9                          | 38.0                                 |
| Rhode Island              | 98.1                               | 99.3                             | 99.1                     | 25.3                               | 42.8                          | 41.9                                 |
| South Carolina            | 99.8                               | 98.7                             | 98.3                     | 44.1                               | 25.3                          | 24.6                                 |
| South Dakota              | 99.4                               | 85.2                             | 84.4                     | 44.3                               | 20.5                          | 19.4                                 |
| Tennessee                 | 95.9                               | 100.0                            | 99.5                     | 47.3                               | 18.3                          | 17.6                                 |
| Texas                     | 38.8                               | <i>Data Not Reported</i>         |                          |                                    |                               |                                      |
| Utah                      | 100.0                              | 95.7                             | 83.0                     | 35.2                               | 29.4                          | 17.0                                 |
| Vermont                   | 99.0                               | 98.8                             | 98.5                     | 27.3                               | 42.0                          | 40.9                                 |
| Virgin Islands            | 25.7                               | <i>Data Not Reported</i>         |                          |                                    |                               |                                      |
| Virginia                  | 99.3                               | 98.3                             | 97.3                     | 41.6                               | 25.8                          | 24.1                                 |
| Washington                | 87.8                               | 44.5                             | 43.6                     | <i>Data Suppressed<sup>b</sup></i> | 16.6                          | 15.4                                 |
| West Virginia             | 50.4                               | <i>Data Not Reported</i>         |                          |                                    |                               |                                      |
| Wisconsin                 | 98.5                               | 93.8                             | 93.7                     | 23.9                               | 41.3                          | 40.5                                 |
| Wyoming                   | 44.9                               | <i>Data Not Reported</i>         |                          |                                    |                               |                                      |
| <b>All reported areas</b> | <b>79.6</b>                        | <b>90.2</b>                      | <b>86.3</b>              | <b>36.4<sup>c</sup></b>            | <b>32.7</b>                   | <b>28.6</b>                          |

<sup>a</sup> Does not include tenant data from suballocators in Illinois or New York.

<sup>b</sup> Too few dates of birth were reported to provide a reliable estimate.

<sup>c</sup> Does not include Illinois, Minnesota, New York, Ohio, and Washington.



Nine states, however, did not submit date of birth for any household members: Connecticut, Florida, Hawaii, Maryland, Massachusetts, Texas, Virgin Islands, West Virginia, and Wyoming. In addition, North Dakota reported date of birth for less than 0.1 percent of reported tenants. Minnesota reported information for only the head of household, limiting the usefulness of the calculated family composition statistics. Each of these states has indicated it will provide this information in its next tenant data submission to HUD.

Table 6 shows the percentage of reported households with children (members under 18 years old), elderly members (those 62 years and older), and elderly heads of household. Overall, more than one-third (36.4 percent) of reported LIHTC households had at least one member under 18 years old. Most states have between 25 and 50 percent of households with at least one member under 18 years old, with Guam (80.0 percent), Alaska (52.5 percent), and Mississippi (51.8 percent) being the only states in which more than 50 percent of LIHTC households have a child.

Nearly 33 percent of reported LIHTC households have an elderly member, and more than one-fourth (28.6 percent) of reported LIHTC households have a head of household at least 62 years old. The percentage of reported heads of households who are 62 years of age or older, in general, is similar to, although slightly lower than, the overall percentage of elderly LIHTC household members in each state. More than 40 percent of reported LIHTC units in New Jersey, Pennsylvania, Rhode Island, Vermont, and Wisconsin have an elderly head. Eight states<sup>23</sup> reported elderly headed households for fewer than 20 percent of LIHTC units.

#### ***D. Household Income***

Household income is a central part of LIHTC tenant qualification and ongoing compliance. To qualify for tax credits, owners of LIHTC properties must elect to maintain maximum income-qualifying limits of either 50 or 60 percent of AMGI.<sup>24</sup> LIHTC property managers must submit detailed household income information to the administering HFA at tenant move in and annually.<sup>25</sup> To certify household income, states collect detailed income information for each household member on the state's TIC forms. The HUD LIHTC Tenant Data Collection Form requests the same income information as collected by states for compliance, although HUD requires only total annual household income. HUD does not require submission of components of household income such as earned income or income from assets. HUD's form also does not require the submission of income for each household member. Because income limits can vary by property depending on the percentage of AMGI an owner elects to enforce, state TIC forms and the HUD LIHTC Tenant Data Collection Form also request the applicable income limit and maximum percentage of AMGI for each unit.

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<sup>23</sup> Guam, Louisiana, Minnesota, Mississippi, South Dakota, Tennessee, Utah, and Washington.

<sup>24</sup> During the state-allocation process, owners may commit to lower income limits, usually 30 or 40 percent of AMGI.

<sup>25</sup> Program rules waive the federal annual income certification requirement for tenants in properties that are 100 percent low-income or rent-restricted units. Some states choose to recertify all tenants.

Although all states receive household income information for compliance, not all states maintained this information electronically before HERA reporting requirements, especially for properties in the extended-use period that have less strict income certification rules. These looser reporting rules and lack of data maintenance hindered the abilities of some HFAs to provide annual household income and related income limit information for all households. Because program rules do not require annual recertification for all units, HUD also requests the income certification date. The income tabulations in this report include only household incomes reported for 2011 or 2012, with the exception of tabulations for Idaho, Kentucky, Michigan, Montana, and Puerto Rico because a large percentage of their households were submitted with certifications early in 2013. This method will exclude some units in properties that are 100 percent low income and some properties in their extended-use period, because annual recertifications are not required.

Table 7 shows the median reported income of households and the distribution of income. In terms of data coverage, total annual household income was reported with certifications dates of 2011 or 2012 (or 2013 in states noted previously) for 91.3 percent of households. Although most states provided income for more than 85 percent of reported households, many of the states that reported income for more than 95 percent of reported households provided information for only about one-half of their LIHTC properties. For example, Illinois provided household income for 100 percent of their reported households but reported only 42.4 percent of LIHTC properties in the state.

**Table 7. Distribution of Annual Household Income**

| State                     | Properties Reported (%)  | Income Reported <sup>a</sup> (%) | Households With Reported Annual Income |                |                         |                          |                          |                | Total (%)    |
|---------------------------|--------------------------|----------------------------------|--|----------------|-------------------------|--------------------------|--------------------------|----------------|--------------|
|                           |                          |                                  | Median (\$)                            | <= \$5,000 (%) | \$5,001 to \$10,000 (%) | \$10,001 to \$15,000 (%) | \$15,001 to \$20,000 (%) | > \$20,000 (%) |              |
| Alabama                   | 47.1                     | 74.6                             | 15,589                                 | 4.7            | 20.9                    | 21.9                     | 21.8                     | 30.8           | 100.0        |
| Alaska                    | 20.0                     | 0.0                              | <i>Data Not Reported</i>               |                |                         |                          |                          |                |              |
| Arizona                   | 71.3                     | 58.7                             | 16,547                                 | 5.7            | 19.4                    | 19.0                     | 18.2                     | 37.7           | 100.0        |
| Arkansas                  | 63.4                     | 96.4                             | 13,180                                 | 9.6            | 26.1                    | 21.0                     | 18.0                     | 25.3           | 100.0        |
| California                | 82.3                     | 93.8                             | 18,630                                 | 4.5            | 6.9                     | 25.9                     | 16.6                     | 46.1           | 100.0        |
| Colorado                  | 77.3                     | 100.0                            | 17,225                                 | 8.6            | 18.8                    | 15.6                     | 15.1                     | 41.8           | 100.0        |
| Connecticut               | 69.1                     | 100.0                            | 19,188                                 | 5.0            | 19.1                    | 14.1                     | 13.7                     | 48.0           | 100.0        |
| Delaware                  | 90.2                     | 99.8                             | 16,095                                 | 9.2            | 18.8                    | 18.3                     | 16.3                     | 37.3           | 100.0        |
| District of Columbia      | <i>Data Not Reported</i> |                                  |  |                |                         |                          |                          |                |              |
| Florida                   | 72.8                     | 91.2                             | 22,241                                 | 3.5            | 9.8                     | 11.4                     | 16.1                     | 59.3           | 100.0        |
| Georgia                   | 64.0                     | 97.0                             | 16,990                                 | 7.0            | 17.1                    | 18.3                     | 17.9                     | 39.7           | 100.0        |
| Guam                      | 100.0                    | 63.9                             | 26,919                                 | 10.2           | 2.6                     | 4.9                      | 10.2                     | 72.2           | 100.0        |
| Hawaii                    | 91.7                     | 100.0                            | 20,934                                 | 2.7            | 17.1                    | 14.4                     | 13.2                     | 52.6           | 100.0        |
| Idaho                     | 100.0                    | 90.2                             | 15,832                                 | 4.8            | 19.9                    | 21.2                     | 21.7                     | 32.4           | 100.0        |
| Illinois <sup>b</sup>     | 42.4                     | 100.0                            | 15,707                                 | 8.9            | 19.5                    | 18.8                     | 18.6                     | 34.2           | 100.0        |
| Indiana                   | 63.3                     | 100.0                            | 15,860                                 | 12.1           | 17.2                    | 17.5                     | 18.3                     | 34.9           | 100.0        |
| Iowa                      | 70.0                     | 99.8                             | 16,533                                 | 16.7           | 13.9                    | 15.0                     | 15.2                     | 39.2           | 100.0        |
| Kansas                    | 74.3                     | 99.0                             | 16,640                                 | 7.6            | 17.3                    | 18.9                     | 19.4                     | 36.7           | 100.0        |
| Kentucky                  | 74.7                     | 97.7                             | 8,769                                  | 32.5           | 22.6                    | 16.3                     | 12.4                     | 16.2           | 100.0        |
| Louisiana                 | 38.2                     | 91.4                             | 14,560                                 | 13.6           | 21.2                    | 16.4                     | 17.9                     | 30.9           | 100.0        |
| Maine                     | 64.2                     | 96.5                             | 15,380                                 | 6.6            | 21.3                    | 20.8                     | 17.5                     | 33.8           | 100.0        |
| Maryland                  | 62.0                     | 100.0                            | 21,063                                 | 4.9            | 15.6                    | 13.4                     | 13.2                     | 52.8           | 100.0        |
| Massachusetts             | 66.9                     | 100.0                            | 15,244                                 | 5.0            | 23.0                    | 21.1                     | 13.5                     | 37.4           | 100.0        |
| Michigan                  | 67.9                     | 100.0                            | 14,256                                 | 10.0           | 23.1                    | 19.6                     | 17.3                     | 30.1           | 100.0        |
| Minnesota                 | 40.7                     | 69.0                             | 18,252                                 | 8.1            | 17.5                    | 14.9                     | 13.9                     | 45.4           | 100.0        |
| Mississippi               | 88.6                     | 99.4                             | 13,987                                 | 16.2           | 19.9                    | 17.4                     | 18.6                     | 27.9           | 100.0        |
| Missouri                  | 47.9                     | 93.6                             | 16,016                                 | 10.5           | 18.1                    | 17.9                     | 17.1                     | 36.4           | 100.0        |
| Montana                   | 81.9                     | 100.0                            | 14,996                                 | 6.3            | 22.4                    | 21.4                     | 20.0                     | 30.0           | 100.0        |
| Nebraska                  | 97.5                     | 99.2                             | 17,014                                 | 17.4           | 11.6                    | 14.3                     | 16.8                     | 39.9           | 100.0        |
| Nevada                    | 69.4                     | 99.9                             | 18,403                                 | 4.1            | 12.6                    | 18.7                     | 20.8                     | 43.7           | 100.0        |
| New Hampshire             | 51.9                     | 89.8                             | 17,484                                 | 17.2           | 12.1                    | 14.1                     | 13.2                     | 43.5           | 100.0        |
| New Jersey                | 33.2                     | 99.2                             | 19,800                                 | 7.4            | 14.7                    | 13.9                     | 14.5                     | 49.4           | 100.0        |
| New Mexico                | <i>Data Not Reported</i> |                                  |  |                |                         |                          |                          |                |              |
| New York <sup>b</sup>     | 34.2                     | 76.3                             | 15,971                                 | 8.0            | 20.2                    | 18.5                     | 15.8                     | 37.5           | 100.0        |
| North Carolina            | 72.0                     | 95.9                             | 14,398                                 | 7.5            | 22.6                    | 22.4                     | 18.8                     | 28.8           | 100.0        |
| North Dakota              | 93.6                     | 100.0                            | 16,853                                 | 8.2            | 17.4                    | 18.6                     | 15.9                     | 39.8           | 100.0        |
| Ohio                      | 71.9                     | 0.0                              | <i>Data Not Reported</i>               |                |                         |                          |                          |                |              |
| Oklahoma                  | 57.4                     | 99.5                             | 13,083                                 | 13.0           | 22.9                    | 22.4                     | 20.2                     | 21.5           | 100.0        |
| Oregon                    | 5.4                      | 94.4                             | 15,515                                 | 17.5           | 16.1                    | 15.0                     | 16.3                     | 35.1           | 100.0        |
| Pennsylvania              | 88.9                     | 99.7                             | 14,692                                 | 10.5           | 21.1                    | 19.7                     | 18.2                     | 30.5           | 100.0        |
| Puerto Rico               | 76.5                     | 99.9                             | 5,587                                  | 46.4           | 31.2                    | 15.4                     | 5.0                      | 2.1            | 100.0        |
| Rhode Island              | 64.7                     | 99.9                             | 13,212                                 | 7.9            | 28.2                    | 20.9                     | 15.4                     | 27.6           | 100.0        |
| South Carolina            | 44.0                     | 97.3                             | 15,612                                 | 7.3            | 19.6                    | 20.4                     | 20.7                     | 32.0           | 100.0        |
| South Dakota              | 69.3                     | 99.1                             | 15,006                                 | 15.4           | 17.2                    | 17.4                     | 15.7                     | 34.3           | 100.0        |
| Tennessee                 | 45.9                     | 100.0                            | 14,341                                 | 14.9           | 19.8                    | 17.4                     | 17.1                     | 30.8           | 100.0        |
| Texas                     | 51.4                     | 96.9                             | 18,089                                 | 9.3            | 15.7                    | 14.2                     | 17.9                     | 43.0           | 100.0        |
| Utah                      | 84.6                     | 96.6                             | 18,530                                 | 8.3            | 15.4                    | 15.2                     | 16.3                     | 44.7           | 100.0        |
| Vermont                   | 55.2                     | 99.0                             | 15,707                                 | 3.4            | 22.7                    | 21.2                     | 17.4                     | 35.2           | 100.0        |
| Virgin Islands            | 79.2                     | 100.0                            | 17,998                                 | 17.2           | 12.5                    | 11.7                     | 13.5                     | 45.2           | 100.0        |
| Virginia                  | 75.5                     | 99.6                             | 21,452                                 | 7.3            | 13.7                    | 12.3                     | 12.9                     | 53.9           | 100.0        |
| Washington                | 1.5                      | 100.0                            | 9,576                                  | 12.8           | 39.3                    | 23.8                     | 11.8                     | 12.3           | 100.0        |
| West Virginia             | 79.0                     | 100.0                            | 12,252                                 | 11.3           | 28.5                    | 21.5                     | 16.5                     | 22.3           | 100.0        |
| Wisconsin                 | 58.1                     | 100.0                            | 18,457                                 | 5.1            | 14.6                    | 17.5                     | 18.9                     | 43.8           | 100.0        |
| Wyoming                   | 67.3                     | 100.0                            | 20,494                                 | 4.9            | 11.9                    | 14.9                     | 16.7                     | 51.6           | 100.0        |
| <b>All reported areas</b> | <b>58.9</b>              | <b>91.3</b>                      | <b>17,066</b>                          | <b>8.6</b>     | <b>16.6</b>             | <b>18.0</b>              | <b>16.5</b>              | <b>40.3</b>    | <b>100.0</b> |

<sup>a</sup> Percentage of reported households in which income was certified in 2011 or 2012. Tabulations for Idaho, Kentucky, Michigan, Montana, and Puerto Rico also include income certified in 2013.

<sup>b</sup> Does not include tenant data from suballocators in Illinois or New York.

The overall median annual income was \$17,066, although the median income varied considerably across states. The median was below \$10,000 for Kentucky, Puerto Rico, and Washington. The low reporting of properties in Washington may indicate that this median and the income distribution are not representative of all LIHTC households in that state. The median household income exceeded \$20,000 in Florida, Guam, Hawaii, Maryland, Virginia, and Wyoming. The reporting for these states was relatively complete, indicating the medians and income distributions for these states are representative.

To aid in comparison with other housing programs, the distribution of household income in table 7 relies on the same categories used for HUD programs.<sup>26</sup> About one-fourth of reported households earned less than \$10,000. As indicated by the median incomes, Kentucky, Puerto Rico, and Washington had the highest percentages of reported household incomes under \$10,000. Approximately 60 percent of reported households nationwide earned less than \$20,000. More than one-half of reported households in Florida, Guam, Hawaii, Maryland, Virginia, and Wyoming earned more than \$20,000. See the appendix for a similar table on HUD-assisted households for each state. Median income in HUD-assisted housing nationally is \$10,272.<sup>27</sup>

Comparing household income across states does not account for differences in cost of living and therefore provides a somewhat skewed comparison. Comparing household income with AMGI provides a more informative assessment and also provides measures of income more directly relevant for LIHTC Program eligibility. HUD, however, does not request AMGI and, to make this comparison, the AMGI must either be determined by address or derived from information provided on the LIHTC Tenant Data Collection Form, specifically the percentage of income or rent restriction (50 or 60 percent of AMGI) and the applicable income limit for each unit. The distribution provided in this report uses the latter method because it yielded a larger sample on which the distribution could be calculated.

As shown in table 8, household annual income, certified in 2011 or 2012, was reported for more than 90 percent of units. Although some of the units excluded from this calculation had incomes certified before 2011, the overwhelming majority of these units were excluded because of missing the income certification date. States with particularly low reporting of household income and certification dates are Alaska (no certification dates), Arizona (no certification dates), and Ohio (certification dates before 2011).

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<sup>26</sup> Recall that the LIHTC Program is not a HUD program.

<sup>27</sup> See table A1 in the Appendix.

**Table 8. Total Annual Household Income Compared With AMGI**

| State                     | Properties Reported (%) | Income Reported <sup>b</sup> (%) | Income, <sup>b</sup> Income Limit and Income Restriction Reported (%) | Total Annual Household Income as Percent of Derived Area Median Gross |                   |                    |                    |                    |                      |              | Total (%) |
|---------------------------|-------------------------|----------------------------------|---|---|-------------------|--------------------|--------------------|--------------------|----------------------|--------------|-----------|
|                           |                         |                                  |   | 0% (%)  | 0.1% to 30.0% (%) | 30.1% to 40.0% (%) | 40.1% to 50.0% (%) | 50.1% to 60.0% (%) | 60.0% or Greater (%) |              |           |
| Alabama                   | 47.1                    | 74.6                             | 72.5  | 0.1   | 38.9              | 21.1               | 15.9               | 14.0               | 10.1                 | 100.0        |           |
| Alaska                    | 20.0                    | 0.0                              | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Arizona                   | 71.3                    | 58.7                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Arkansas                  | 63.4                    | 96.4                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| California                | 82.3                    | 93.8                             | 80.6  | 1.4   | 52.7              | 18.6               | 13.0               | 8.5                | 5.9                  | 100.0        |           |
| Colorado                  | 77.3                    | 100.0                            | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Connecticut               | 69.1                    | 100.0                            | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Delaware                  | 90.2                    | 99.8                             | 99.8  | 1.9   | 48.0              | 18.8               | 15.9               | 9.0                | 6.4                  | 100.0        |           |
| District of Columbia      |                         |                                  |   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Florida                   | 72.8                    | 91.2                             | 83.4  | 0.4   | 20.9              | 18.9               | 25.6               | 25.5               | 8.7                  | 100.0        |           |
| Georgia                   | 64.0                    | 97.0                             | 97.0  | 1.2   | 35.7              | 20.1               | 18.8               | 14.0               | 10.1                 | 100.0        |           |
| Guam                      | 100.0                   | 63.9                             | 63.0  | 3.4   | 15.6              | 19.8               | 21.0               | 38.9               | 1.1                  | 100.0        |           |
| Hawaii                    | 91.7                    | 100.0                            | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Idaho                     | 100.0                   | 90.2                             | 73.8  | 0.9   | 36.3              | 23.3               | 20.5               | 12.3               | 6.7                  | 100.0        |           |
| Illinois <sup>c</sup>     | 42.4                    | 100.0                            | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Indiana                   | 63.3                    | 100.0                            | 99.9  | 0.8   | 39.4              | 20.5               | 20.7               | 13.1               | 5.6                  | 100.0        |           |
| Iowa                      | 70.0                    | 99.8                             | 99.8  | 0.0   | 47.5              | 18.1               | 16.1               | 14.1               | 4.2                  | 100.0        |           |
| Kansas                    | 74.3                    | 99.0                             | 99.0  | 2.0   | 39.6              | 20.7               | 19.4               | 13.8               | 4.5                  | 100.0        |           |
| Kentucky                  | 74.7                    | 97.7                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Louisiana                 | 38.2                    | 91.4                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Maine                     | 64.2                    | 96.5                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Maryland                  | 62.0                    | 100.0                            | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Massachusetts             | 66.9                    | 100.0                            | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Michigan                  | 67.9                    | 100.0                            | 100.0   | 0.0   | 53.7              | 17.8               | 13.9               | 9.0                | 5.5                  | 100.0        |           |
| Minnesota                 | 40.7                    | 69.0                             | 67.5  | 0.0   | 51.3              | 17.5               | 15.6               | 12.1               | 3.5                  | 100.0        |           |
| Mississippi               | 88.6                    | 99.4                             | 99.4  | 0.0   | 46.7              | 18.2               | 17.0               | 13.2               | 4.9                  | 100.0        |           |
| Missouri                  | 47.9                    | 93.6                             | 93.6  | 0.0   | 45.3              | 18.8               | 16.1               | 12.9               | 6.9                  | 100.0        |           |
| Montana                   | 81.9                    | 100.0                            | 100.0   | 0.0   | 45.4              | 21.2               | 18.2               | 11.5               | 3.7                  | 100.0        |           |
| Nebraska                  | 97.5                    | 99.2                             | 99.2  | 0.0   | 45.5              | 17.7               | 17.6               | 14.9               | 4.5                  | 100.0        |           |
| Nevada                    | 69.4                    | 99.9                             | 99.9  | 0.0   | 38.4              | 22.6               | 18.4               | 13.5               | 7.1                  | 100.0        |           |
| New Hampshire             | 51.9                    | 89.8                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| New Jersey                | 33.2                    | 99.2                             | 99.2  | 2.4   | 47.5              | 18.9               | 14.9               | 8.6                | 7.6                  | 100.0        |           |
| New Mexico                |                         |                                  |   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| New York <sup>c</sup>     | 34.2                    | 76.3                             | 75.1  | 4.1   | 49.3              | 17.6               | 14.3               | 8.3                | 6.5                  | 100.0        |           |
| North Carolina            | 72.0                    | 95.9                             | 84.2  | 0.0   | 46.4              | 20.1               | 16.7               | 10.7               | 6.2                  | 100.0        |           |
| North Dakota              | 93.6                    | 100.0                            | 100.0   | 0.0   | 45.9              | 18.8               | 16.0               | 12.3               | 7.0                  | 100.0        |           |
| Ohio                      | 71.9                    | 0.0                              | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Oklahoma                  | 57.4                    | 99.5                             | 99.5  | 0.0   | 47.5              | 20.2               | 15.9               | 10.2               | 6.2                  | 100.0        |           |
| Oregon                    | 5.4                     | 94.4                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Pennsylvania              | 88.9                    | 99.7                             | 99.7  | 5.4   | 49.3              | 20.1               | 14.0               | 8.2                | 3.1                  | 100.0        |           |
| Puerto Rico               | 76.5                    | 99.9                             | 99.9  | 0.0   | 68.4              | 11.6               | 9.3                | 7.1                | 3.7                  | 100.0        |           |
| Rhode Island              | 64.7                    | 99.9                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| South Carolina            | 44.0                    | 97.3                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| South Dakota              | 69.3                    | 99.1                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Tennessee                 | 45.9                    | 100.0                            | 99.7  | 3.5   | 45.0              | 17.2               | 15.7               | 12.7               | 6.0                  | 100.0        |           |
| Texas                     | 51.4                    | 96.9                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Utah                      | 84.6                    | 96.6                             | 96.5  | 3.0   | 33.9              | 19.7               | 20.7               | 14.9               | 7.7                  | 100.0        |           |
| Vermont                   | 55.2                    | 99.0                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Virgin Islands            | 79.2                    | 100.0                            | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Virginia                  | 75.5                    | 99.6                             | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Washington                | 1.5                     | 100.0                            | 99.9  | 2.8   | 75.3              | 13.3               | 6.1                | 1.5                | 1.0                  | 100.0        |           |
| West Virginia             | 79.0                    | 100.0                            | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Wisconsin                 | 58.1                    | 100.0                            | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| Wyoming                   | 67.3                    | 100.0                            | 0.0   | Data Not Reported   |                   |                    |                    |                    |                      |              |           |
| <b>All reported areas</b> | <b>58.9</b>             | <b>91.3</b>                      | <b>54.7</b>   | <b>1.3</b>  | <b>44.8</b>       | <b>18.7</b>        | <b>16.5</b>        | <b>12.4</b>        | <b>6.3</b>           | <b>100.0</b> |           |

AMGI = Area Median Gross Income. HH = household.

<sup>a</sup> AMGI was derived by dividing the income limit by the percent income restriction.

<sup>b</sup> Percentage of reported households the incomes of which were certified in 2011 or 2012. Tabulations for Idaho, Kentucky, Michigan, Montana, and Puerto Rico also include income certified in 2013.

<sup>c</sup> Does not include tenant data from suballocators in Illinois or New York.

The third column in table 8 shows the percentage of units that reported the three pieces of information necessary to calculate the distribution of LIHTC households by income level relative to AMGI: annual household income, the applicable income limit for the unit, and the applicable percentage income restriction. AMGI is derived using the income limit and percentage income restriction. As noted previously, although AMGI could be determined based on a unit's address, address reporting was insufficient for too many units to attempt this type of match.<sup>28</sup> Missing data on income limit or percentage income restriction reduced the number of states for which HUD could calculate income distribution.

Data sufficient to calculate household annual income as a percentage of AMGI were provided for 28 states. The distribution across states is fairly consistent. Between one-third and one-half of LIHTC households in these states earn less than 30 percent of AMGI. Many of these households may well receive monthly rental assistance (see table 10), although data coverage of monthly rental assistance prevents a complete understanding. The states with the highest percentage of reported LIHTC households with incomes less than 30 percent of AMGI are Washington (2.8 percent with no annual income and 75.3 percent with positive income below 30 percent of AMGI), Minnesota (51.3 percent with positive income below 30 percent of AMGI), and New York (4.1 percent with no annual income and 49.3 percent with positive income below 30 percent of AMGI).

The percentage of households earning more than 30 percent of AMGI, but less than the federal maximum for initial qualification of 60 percent, accounts for nearly one-half of reported LIHTC households. The households in this range are almost equally divided in the three groups shown in table 8: 30.1 to 40.0 percent of AMGI, 40.1 to 50.0 percent of AMGI, and 50.1 to 60.0 percent of AMGI. The lowest of these three groups (30.1 to 40.0 percent of AMGI) includes slightly more households, indicating that the LIHTC Program serves many households at income levels well below the program's federal maximum of 60 percent of AMGI.

Unlike many demand-side housing subsidy programs that reduce benefits to households whose incomes increase above applicable income limits, the LIHTC Program allows households to remain in rent-restricted units and pay low-income rents regardless of household income.<sup>29</sup> The final column of table 8 shows the percentage of reported households with incomes above 60 percent of AMGI. In general, fewer than 10 percent of reported households have annual incomes in this range. Note that data errors in any of the three components needed to derive AMGI could contribute to these results.

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<sup>28</sup> To ease the reporting burden on HFAs, HUD requests address information as reported to the IRS. The IRS, however, requires only a property address, which is insufficient for geocoding scattered-site properties.

<sup>29</sup> Program rules require households to qualify initially under applicable program income limits. If a tenant's income increases to more than 140 percent of AMGI, then the building's next available market-rate unit must be rent restricted and leased to an income-qualified household.

## ***E. Monthly Rental Payments and Use of Rental Assistance***

### **Monthly Rental Payments**

A critical goal of the LIHTC Program is to provide affordable housing, limiting the share of a household's income paid in rent, or *rent burden*. The LIHTC Program restricts the maximum rent that can be charged for a unit to 30 percent of either 50 or 60 percent of AMGI, according to the level chosen by the developer during the application process.<sup>30</sup> Although the LIHTC Program sets a maximum rent, actual rents are often less and can fluctuate with market conditions. Unlike most housing programs, income and rent limits are set for the unit, do not vary directly with tenant income, and may exceed 30 percent of income at qualification. In addition, once qualified for a unit based on the unit's income limits, increases or decreases in a tenant's household income does not result in corresponding changes in rent paid. The combination of these factors may result in the share of a household's income spent on rent varying substantially from 30 percent.

HUD's LIHTC Tenant Data Collection Form requests components of gross rent, which includes tenant-paid rent, utility allowance and other nonoptional charges. Table 9 shows the distribution of gross rent as a percentage of annual household income. To calculate this distribution, both household income and rent must be provided. As in the previous section, this section includes only household incomes certified in 2011 or 2012. The first column of table 9 lists the percentage of occupied units with both annual household income and gross rent. Overall, 90.3 percent of reported units included both income and rent. Insufficient data from two states, Alaska and Ohio, prevented calculations. Income certification dates were missing for households in Alaska. Income for Ohio's households did not include all components of annual household income and the certification dates were mostly before 2011. Arizona was the only other state in which income and rent were reported for less than 60 percent of households.

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<sup>30</sup> States may impose additional restrictions during the allocation and selection processes.

**Table 9. Gross Rent As Percentage of Annual Household Income**

| State                     | Household Income <sup>a</sup><br>and Rent Reported<br>(%) | Tenant-Paid Rent As Percentage of Total Annual Household Income |                    |                     |                     |                        |            | Unable To<br>Calculate <sup>b</sup><br>(%) | Total<br>(%) |
|---------------------------|---|---|--------------------|---------------------|---------------------|------------------------|------------|--|--------------|
|                           |   | 0<br>(%)  | 0.1 to 30.0<br>(%) | 30.1 to 40.0<br>(%) | 40.1 to 50.0<br>(%) | 50.1 or Greater<br>(%) |            |  |              |
| Alabama                   | 74.6  | 7.2   | 64.1               | 15.7                | 6.8                 | 6.2                    | 0.1        | 100.0                                      |              |
| Alaska                    | 0.0   | <i>Data Not Reported</i>  |                    |                     |                     |                        |            |  |              |
| Arizona                   | 58.7  | 0.8   | 43.2               | 22.6                | 14.7                | 18.0                   | 0.6        | 100.0                                      |              |
| Arkansas                  | 89.2  | 0.0   | 70.2               | 14.7                | 6.5                 | 7.1                    | 1.5        | 100.0                                      |              |
| California                | 93.8  | 0.8   | 51.4               | 20.0                | 12.7                | 13.6                   | 1.4        | 100.0                                      |              |
| Colorado                  | 100.0   | 3.4   | 54.0               | 20.8                | 10.0                | 8.9                    | 2.9        | 100.0                                      |              |
| Connecticut               | 100.0   | 4.5   | 66.6               | 15.1                | 6.3                 | 6.2                    | 1.3        | 100.0                                      |              |
| Delaware                  | 99.8  | 8.6   | 66.3               | 13.2                | 4.2                 | 5.8                    | 1.9        | 100.0                                      |              |
| District of Columbia      |   | <i>Data Not Reported</i>  |                    |                     |                     |                        |            |  |              |
| Florida                   | 90.2  | 2.4   | 37.7               | 33.8                | 14.9                | 10.8                   | 0.4        | 100.0                                      |              |
| Georgia                   | 97.0  | 9.4   | 56.8               | 18.0                | 7.8                 | 6.8                    | 1.2        | 100.0                                      |              |
| Guam                      | 63.9  | 11.3  | 65.8               | 11.7                | 4.1                 | 1.9                    | 5.3        | 100.0                                      |              |
| Hawaii                    | 100.0   | 1.0   | 68.1               | 14.7                | 7.4                 | 8.3                    | 0.5        | 100.0                                      |              |
| Idaho                     | 89.7  | 3.1   | 54.2               | 21.8                | 10.1                | 9.8                    | 1.0        | 100.0                                      |              |
| Illinois <sup>c</sup>     | 100.0   | 4.9   | 58.7               | 16.3                | 7.2                 | 9.6                    | 3.4        | 100.0                                      |              |
| Indiana                   | 100.0   | 5.9   | 58.2               | 20.3                | 7.4                 | 7.4                    | 0.8        | 100.0                                      |              |
| Iowa                      | 99.8  | 0.0   | 57.7               | 16.8                | 6.3                 | 19.2                   | 0.0        | 100.0                                      |              |
| Kansas                    | 99.0  | 5.6   | 60.6               | 17.9                | 6.8                 | 7.0                    | 2.1        | 100.0                                      |              |
| Kentucky                  | 97.8  | 77.5  | 0.0                | 0.0                 | 0.0                 | 0.0                    | 22.5       | 100.0                                      |              |
| Louisiana                 | 83.9  | 0.0   | 52.0               | 22.4                | 8.6                 | 11.8                   | 5.2        | 100.0                                      |              |
| Maine                     | 94.3  | 0.0   | 62.9               | 19.3                | 7.3                 | 8.0                    | 2.5        | 100.0                                      |              |
| Maryland                  | 100.0   | 4.2   | 54.5               | 20.6                | 9.8                 | 9.4                    | 1.4        | 100.0                                      |              |
| Massachusetts             | 100.0   | 1.7   | 75.4               | 12.0                | 4.2                 | 5.8                    | 1.0        | 100.0                                      |              |
| Michigan                  | 100.0   | 0.0   | 63.7               | 16.4                | 7.8                 | 12.1                   | 0.0        | 100.0                                      |              |
| Minnesota                 | 68.9  | 3.1   | 62.7               | 17.3                | 7.4                 | 9.5                    | 0.0        | 100.0                                      |              |
| Mississippi               | 99.4  | 0.0   | 63.3               | 16.5                | 6.9                 | 13.3                   | 0.0        | 100.0                                      |              |
| Missouri                  | 93.6  | 0.0   | 75.6               | 12.1                | 4.5                 | 7.7                    | 0.0        | 100.0                                      |              |
| Montana                   | 100.0   | 0.0   | 66.0               | 17.2                | 7.0                 | 9.8                    | 0.0        | 100.0                                      |              |
| Nebraska                  | 99.2  | 0.0   | 62.5               | 13.7                | 4.9                 | 18.9                   | 0.0        | 100.0                                      |              |
| Nevada                    | 99.9  | 0.0   | 48.6               | 23.8                | 14.5                | 13.2                   | 0.0        | 100.0                                      |              |
| New Hampshire             | 87.6  | 0.0   | 47.8               | 18.3                | 9.4                 | 13.1                   | 11.4       | 100.0                                      |              |
| New Jersey                | 99.2  | 3.6   | 60.3               | 16.1                | 7.6                 | 10.1                   | 2.4        | 100.0                                      |              |
| New Mexico                |   | <i>Data Not Reported</i>  |                    |                     |                     |                        |            |  |              |
| New York <sup>c</sup>     | 75.1  | 1.1   | 59.9               | 16.3                | 7.1                 | 12.0                   | 3.7        | 100.0                                      |              |
| North Carolina            | 87.8  | 0.0   | 68.6               | 16.6                | 7.0                 | 7.9                    | 0.0        | 100.0                                      |              |
| North Dakota              | 100.0   | 0.0   | 67.3               | 16.4                | 6.7                 | 9.6                    | 0.0        | 100.0                                      |              |
| Ohio                      | 0.0   | <i>Data Not Reported</i>  |                    |                     |                     |                        |            |  |              |
| Oklahoma                  | 99.5  | 0.0   | 70.0               | 15.1                | 6.3                 | 8.6                    | 0.0        | 100.0                                      |              |
| Oregon                    | 91.1  | 0.0   | 33.1               | 20.7                | 11.3                | 20.4                   | 14.4       | 100.0                                      |              |
| Pennsylvania              | 99.7  | 5.1   | 65.2               | 13.8                | 5.6                 | 4.9                    | 5.4        | 100.0                                      |              |
| Puerto Rico               | 99.9  | 0.0   | 85.2               | 4.4                 | 1.6                 | 8.8                    | 0.0        | 100.0                                      |              |
| Rhode Island              | 97.2  | 0.0   | 84.1               | 6.3                 | 2.5                 | 3.8                    | 3.3        | 100.0                                      |              |
| South Carolina            | 90.3  | 0.0   | 59.9               | 21.1                | 9.0                 | 8.8                    | 1.2        | 100.0                                      |              |
| South Dakota              | 90.3  | 0.0   | 64.7               | 14.8                | 5.8                 | 9.6                    | 5.1        | 100.0                                      |              |
| Tennessee                 | 100.0   | 10.8  | 58.0               | 16.2                | 6.0                 | 5.5                    | 3.5        | 100.0                                      |              |
| Texas                     | 96.9  | 6.2   | 46.9               | 25.0                | 10.6                | 9.8                    | 1.4        | 100.0                                      |              |
| Utah                      | 96.6  | 3.1   | 50.9               | 21.0                | 10.1                | 11.9                   | 3.1        | 100.0                                      |              |
| Vermont                   | 97.9  | 0.0   | 70.8               | 14.4                | 7.0                 | 7.1                    | 0.8        | 100.0                                      |              |
| Virgin Islands            | 100.0   | 25.6  | 56.7               | 10.5                | 4.3                 | 2.8                    | 0.1        | 100.0                                      |              |
| Virginia                  | 93.6  | 0.0   | 49.9               | 24.8                | 11.1                | 13.3                   | 0.9        | 100.0                                      |              |
| Washington                | 99.7  | 3.8   | 84.4               | 5.5                 | 1.4                 | 2.1                    | 2.9        | 100.0                                      |              |
| West Virginia             | 100.0   | 7.3   | 66.7               | 12.0                | 5.3                 | 7.6                    | 1.1        | 100.0                                      |              |
| Wisconsin                 | 100.0   | 2.2   | 51.6               | 24.4                | 11.5                | 8.3                    | 2.0        | 100.0                                      |              |
| Wyoming                   | 100.0   | 2.8   | 60.4               | 19.6                | 7.4                 | 8.9                    | 0.9        | 100.0                                      |              |
| <b>All reported areas</b> | <b>90.3</b>   | <b>3.9</b>  | <b>55.7</b>        | <b>19.6</b>         | <b>9.1</b>          | <b>10.0</b>            | <b>1.8</b> | <b>100.0</b>                               |              |

<sup>a</sup> Percentage of reported households in which income was certified in 2011 or 2012. Tabulations for Idaho, Kentucky, Michigan, Montana, and Puerto Rico also include income certified in 2013.

<sup>b</sup> Ratio of tenant-paid rent to household income could not be calculated because total annual household income equals \$0.

<sup>c</sup> Does not include tenant data from suballocators in Illinois or New York.



More than one-half of reported LIHTC households in the nation do not face an affordable rent burden—that is, they pay less than 30 percent of household income in rent—and three-fourths spend no more than 40 percent of their income on rent, but 10 percent are severely burdened—that is, pay more than 50 percent of annual household income for rent. Although the distribution is similar for most states, LIHTC households in several states are considerably more burdened. In Oregon, whereas 33.1 percent of reported LIHTC households pay less than 30 percent of income toward rent, 20.4 percent of reported LIHTC households are severely rent burdened and pay at least one-half of their income for rent. At the other extreme, more than 80 percent of LIHTC households in Rhode Island, Washington and Puerto Rico do not have an affordable rent burden. The final column of table 9 shows the percentage of households with reported annual incomes of \$0, preventing the calculation of rent to household income. Although this percentage is fairly low for most states, more than one-fourth of reported households in Kentucky had an annual income of \$0. Oregon (14.4 percent) and New Hampshire (11.4 percent) also reported more than 10 percent of households with \$0 of annual income.

### **Use of Rental Assistance**

As stated previously, more than one-half of LIHTC households earn less than 40 percent of AMGI yet federal maximum unit rents are established to be affordable for households at 50 or 60 percent of AMGI. This gap may partially be filled by various types of rental assistance—both project- and tenant-based assistance from HUD, the U.S. Department of Agriculture, and state programs. HUD’s LIHTC Tenant Data Collection Form requests the amount of rental assistance received for a unit. The most recent collection of tenant data also requires the source of rental assistance, but it is not included in this report because many HFAs were unable to provide this detail. Thus, the following information includes rental assistance for all sources: federal, state, local, and nonprofit organizations, both unit and household based.

Table 10 shows the use of rental assistance for reported LIHTC tenants. Overall, use of rental assistance was not indicated for one-third of reported tenants (31.5 percent). Reporting, however, varied significantly by state; 23 states provided amount of rental assistance for all reported households, whereas 7 states did not provide an indication of rental assistance for any reported tenants.

For households for which this information was reported, slightly more than one-half either receive tenant-based rental assistance or reside in a unit receiving rental assistance. Focusing on the 23 states with complete reporting on use of rental assistance, most show similar usage, with roughly one-half of reported households receiving some form of assistance. Mississippi (60.4 percent of households) and Puerto Rico (71.7) reported the highest percentages of LIHTC households receiving rental assistance. Nevada (23.4 percent) and Utah (30.1 percent) had the lowest percentages of LIHTC households receiving monthly rental assistance. The use of rental assistance correlates with the percentage of households earning less than 30 percent of AMGI in table 7. Mississippi (46.7 percent) and Puerto Rico (68.7 percent) had relatively high percentages of households earning below this threshold, whereas Nevada (38.4 percent) and Utah (36.9 percent) had among the lowest percentages.

**Table 10. Percentage of LIHTC Households Receiving Monthly Rental Assistance**

| State                     | Properties Reported (%)  | Amount of Monthly Rental Assistance |             |             |
|---------------------------|--------------------------|-------------------------------------|-------------|-------------|
|                           |                          | Not Reported (%)                    | \$0 (%)     | > \$0 (%)   |
| Alabama                   | 47.1                     | 0.0                                 | 60.4        | 39.6        |
| Alaska                    | 20.0                     | 0.0                                 | 57.3        | 42.7        |
| Arizona                   | 71.3                     | 12.9                                | 65.6        | 21.4        |
| Arkansas                  | 63.4                     | 48.7                                | 0.0         | 51.3        |
| California                | 82.3                     | 0.1                                 | 63.4        | 36.5        |
| Colorado                  | 77.3                     | 78.7                                | 0.0         | 21.3        |
| Connecticut               | 69.1                     | 100.0                               | 0.0         | 0.0         |
| Delaware                  | 90.2                     | 0.0                                 | 46.4        | 53.6        |
| District of Columbia      | <i>Data Not Reported</i> |                                     |             |             |
| Florida                   | 72.8                     | 72.0                                | 9.8         | 18.1        |
| Georgia                   | 64.0                     | 0.0                                 | 61.5        | 38.5        |
| Guam                      | 100.0                    | 74.0                                | 0.2         | 25.7        |
| Hawaii                    | 91.7                     | 100.0                               | 0.0         | 0.0         |
| Idaho                     | 100.0                    | 29.3                                | 37.4        | 33.3        |
| Illinois <sup>a</sup>     | 42.4                     | 0.0                                 | 56.5        | 43.5        |
| Indiana                   | 63.3                     | 0.0                                 | 57.9        | 42.1        |
| Iowa                      | 70.0                     | 0.0                                 | 59.1        | 40.9        |
| Kansas                    | 74.3                     | 0.0                                 | 59.4        | 40.6        |
| Kentucky                  | 74.7                     | 0.0                                 | 53.5        | 46.5        |
| Louisiana                 | 38.2                     | 63.7                                | 0.0         | 36.3        |
| Maine                     | 64.2                     | 40.3                                | 0.0         | 59.7        |
| Maryland                  | 62.0                     | 100.0                               | 0.0         | 0.0         |
| Massachusetts             | 66.9                     | 100.0                               | 0.0         | 0.0         |
| Michigan                  | 67.9                     | 0.0                                 | 49.2        | 50.8        |
| Minnesota                 | 40.7                     | 46.3                                | 53.7        | 0.0         |
| Mississippi               | 88.6                     | 0.0                                 | 39.6        | 60.4        |
| Missouri                  | 47.9                     | 0.0                                 | 54.1        | 45.9        |
| Montana                   | 81.9                     | 0.0                                 | 49.4        | 50.6        |
| Nebraska                  | 97.5                     | 0.0                                 | 58.8        | 41.2        |
| Nevada                    | 69.4                     | 0.0                                 | 76.6        | 23.4        |
| New Hampshire             | 51.9                     | 52.6                                | 0.0         | 47.4        |
| New Jersey                | 33.2                     | 0.0                                 | 59.7        | 40.3        |
| New Mexico                | <i>Data Not Reported</i> |                                     |             |             |
| New York <sup>a</sup>     | 34.2                     | 71.7                                | 8.5         | 19.8        |
| North Carolina            | 72.0                     | 50.5                                | 0.0         | 49.5        |
| North Dakota              | 93.6                     | 0.0                                 | 100.0       | 0.0         |
| Ohio                      | 71.9                     | 2.5                                 | 42.3        | 55.2        |
| Oklahoma                  | 57.4                     | 0.0                                 | 46.2        | 53.8        |
| Oregon                    | 5.4                      | 76.3                                | 0.0         | 23.7        |
| Pennsylvania              | 88.9                     | 0.0                                 | 45.1        | 54.9        |
| Puerto Rico               | 76.5                     | 0.0                                 | 28.3        | 71.7        |
| Rhode Island              | 64.7                     | 81.7                                | 0.0         | 18.3        |
| South Carolina            | 44.0                     | 59.4                                | 0.0         | 40.6        |
| South Dakota              | 69.3                     | 63.7                                | 0.0         | 36.3        |
| Tennessee                 | 45.9                     | 0.0                                 | 49.9        | 50.1        |
| Texas                     | 51.4                     | 50.6                                | 10.8        | 38.6        |
| Utah                      | 84.6                     | 0.0                                 | 69.9        | 30.1        |
| Vermont                   | 55.2                     | 36.4                                | 0.0         | 63.6        |
| Virgin Islands            | 79.2                     | 100.0                               | 0.0         | 0.0         |
| Virginia                  | 75.5                     | 64.1                                | 0.0         | 35.9        |
| Washington                | 1.5                      | 0.1                                 | 12.9        | 87.0        |
| West Virginia             | 79.0                     | 100.0                               | 0.0         | 0.0         |
| Wisconsin                 | 58.1                     | 0.0                                 | 63.4        | 36.6        |
| Wyoming                   | 67.3                     | 100.0                               | 0.0         | 0.0         |
| <b>All reported areas</b> | <b>58.9</b>              | <b>31.5</b>                         | <b>32.4</b> | <b>36.0</b> |

LIHTC = low-income housing tax credit.

<sup>a</sup> Does not include tenant data from suballocators in Illinois or New York.

## VI. Appendix

**Table A1. Distribution of Income for All HUD-Assisted Housing, December 31, 2012**

| State                | Total Number of Reported Households | Annual Household Income |                |                         |                          |                          |                | Total (%)    |
|----------------------|-------------------------------------|-------------------------|----------------|-------------------------|--------------------------|--------------------------|----------------|--------------|
|                      |                                     | Median (\$)             | <= \$5,000 (%) | \$5,001 to \$10,000 (%) | \$10,001 to \$15,000 (%) | \$15,001 to \$20,000 (%) | > \$20,000 (%) |              |
| Alabama              | 85,007                              | 8,728                   | 21.5           | 36.0                    | 21.2                     | 11.8                     | 9.5            | 100.0        |
| Alaska               | 7,777                               | 15,378                  | 10.0           | 8.0                     | 29.4                     | 24.1                     | 28.5           | 100.0        |
| Arizona              | 38,503                              | 9,288                   | 18.6           | 35.3                    | 22.3                     | 11.9                     | 11.9           | 100.0        |
| Arkansas             | 47,127                              | 9,095                   | 16.0           | 40.5                    | 23.8                     | 12.2                     | 7.6            | 100.0        |
| California           | 457,615                             | 11,003                  | 7.9            | 15.1                    | 41.8                     | 16.2                     | 19.0           | 100.0        |
| Colorado             | 58,052                              | 9,419                   | 16.1           | 37.4                    | 22.5                     | 12.9                     | 11.1           | 100.0        |
| Connecticut          | 72,903                              | 12,276                  | 10.5           | 29.6                    | 21.2                     | 15.4                     | 23.2           | 100.0        |
| Delaware             | 11,737                              | 11,009                  | 13.9           | 30.1                    | 23.7                     | 15.1                     | 17.2           | 100.0        |
| District of Columbia | 23,256                              | 9,381                   | 18.9           | 33.7                    | 17.6                     | 10.0                     | 19.9           | 100.0        |
| Florida              | 182,256                             | 9,180                   | 15.3           | 38.8                    | 20.8                     | 12.3                     | 12.8           | 100.0        |
| Georgia              | 125,926                             | 9,096                   | 20.5           | 34.3                    | 21.5                     | 12.3                     | 11.4           | 100.0        |
| Guam                 | 3,158                               | 9,426                   | 37.9           | 13.4                    | 14.4                     | 15.2                     | 19.1           | 100.0        |
| Hawaii               | 17,947                              | 12,324                  | 7.3            | 32.8                    | 21.1                     | 13.6                     | 25.2           | 100.0        |
| Idaho                | 11,850                              | 9,733                   | 13.5           | 38.2                    | 25.3                     | 13.2                     | 9.8            | 100.0        |
| Illinois             | 197,861                             | 9,780                   | 16.9           | 34.1                    | 20.1                     | 14.2                     | 14.7           | 100.0        |
| Indiana              | 81,227                              | 9,096                   | 23.2           | 31.8                    | 23.1                     | 12.9                     | 9.1            | 100.0        |
| Iowa                 | 37,130                              | 10,608                  | 12.1           | 34.0                    | 28.4                     | 15.3                     | 10.3           | 100.0        |
| Kansas               | 31,730                              | 10,500                  | 13.5           | 33.5                    | 25.8                     | 14.6                     | 12.6           | 100.0        |
| Kentucky             | 76,761                              | 8,616                   | 22.2           | 36.9                    | 21.0                     | 10.7                     | 9.1            | 100.0        |
| Louisiana            | 82,763                              | 9,094                   | 16.2           | 38.6                    | 20.4                     | 13.2                     | 11.5           | 100.0        |
| Maine                | 25,218                              | 10,699                  | 8.6            | 36.5                    | 27.1                     | 14.8                     | 13.0           | 100.0        |
| Maryland             | 87,752                              | 11,061                  | 11.6           | 33.6                    | 20.5                     | 13.4                     | 21.0           | 100.0        |
| Massachusetts        | 179,867                             | 12,696                  | 6.5            | 28.9                    | 25.2                     | 15.3                     | 24.1           | 100.0        |
| Michigan             | 134,969                             | 9,744                   | 15.5           | 35.9                    | 23.3                     | 13.9                     | 11.4           | 100.0        |
| Minnesota            | 85,246                              | 11,136                  | 12.0           | 31.8                    | 25.0                     | 15.1                     | 16.1           | 100.0        |
| Mississippi          | 51,313                              | 8,688                   | 20.9           | 37.8                    | 21.1                     | 11.9                     | 8.4            | 100.0        |
| Missouri             | 84,166                              | 9,384                   | 20.1           | 33.5                    | 23.6                     | 12.5                     | 10.4           | 100.0        |
| Montana              | 12,312                              | 9,948                   | 15.6           | 34.8                    | 25.6                     | 13.7                     | 10.3           | 100.0        |
| Nebraska             | 25,568                              | 11,040                  | 14.7           | 29.5                    | 26.8                     | 15.7                     | 13.3           | 100.0        |
| Nevada               | 21,495                              | 9,780                   | 20.2           | 31.1                    | 22.5                     | 12.3                     | 13.9           | 100.0        |
| New Hampshire        | 20,264                              | 13,070                  | 4.5            | 27.1                    | 28.1                     | 19.2                     | 21.1           | 100.0        |
| New Jersey           | 154,001                             | 12,300                  | 9.0            | 30.3                    | 22.0                     | 15.1                     | 23.6           | 100.0        |
| New Mexico           | 22,303                              | 8,928                   | 15.9           | 40.1                    | 23.9                     | 11.4                     | 8.8            | 100.0        |
| New York             | 555,909                             | 13,065                  | 4.9            | 32.9                    | 20.9                     | 14.6                     | 26.8           | 100.0        |
| North Carolina       | 119,332                             | 8,820                   | 21.6           | 35.8                    | 22.5                     | 11.5                     | 8.7            | 100.0        |
| North Dakota         | 10,832                              | 10,866                  | 13.9           | 30.5                    | 27.2                     | 14.7                     | 13.6           | 100.0        |
| Ohio                 | 212,065                             | 8,616                   | 25.0           | 34.7                    | 20.5                     | 11.6                     | 8.3            | 100.0        |
| Oklahoma             | 50,475                              | 8,868                   | 23.8           | 34.8                    | 21.5                     | 11.6                     | 8.3            | 100.0        |
| Oregon               | 51,033                              | 9,336                   | 10.7           | 43.3                    | 24.1                     | 12.0                     | 10.0           | 100.0        |
| Pennsylvania         | 200,947                             | 10,716                  | 12.8           | 33.9                    | 23.7                     | 15.3                     | 14.3           | 100.0        |
| Puerto Rico          | 101,396                             | 2,760                   | 65.2           | 21.5                    | 7.6                      | 3.8                      | 1.9            | 100.0        |
| Rhode Island         | 35,480                              | 11,877                  | 8.5            | 32.6                    | 23.8                     | 16.0                     | 19.0           | 100.0        |
| South Carolina       | 59,333                              | 8,724                   | 24.4           | 33.5                    | 21.6                     | 11.8                     | 8.8            | 100.0        |
| South Dakota         | 12,358                              | 10,213                  | 17.6           | 31.3                    | 26.2                     | 13.9                     | 11.0           | 100.0        |
| Tennessee            | 98,969                              | 8,640                   | 23.8           | 34.3                    | 22.1                     | 11.2                     | 8.6            | 100.0        |
| Texas                | 260,140                             | 9,129                   | 18.1           | 36.7                    | 20.4                     | 12.6                     | 12.3           | 100.0        |
| Utah                 | 17,604                              | 9,696                   | 16.4           | 35.4                    | 23.5                     | 13.0                     | 11.8           | 100.0        |
| Vermont              | 11,790                              | 12,025                  | 3.7            | 34.8                    | 26.8                     | 16.7                     | 18.0           | 100.0        |
| Virgin Islands       | 5,037                               | 10,128                  | 29.3           | 20.3                    | 15.2                     | 9.7                      | 25.5           | 100.0        |
| Virginia             | 95,630                              | 9,876                   | 18.5           | 32.1                    | 21.0                     | 12.5                     | 16.0           | 100.0        |
| Washington           | 83,576                              | 9,744                   | 11.8           | 39.4                    | 23.7                     | 11.9                     | 13.2           | 100.0        |
| West Virginia        | 31,068                              | 8,616                   | 20.1           | 39.5                    | 21.8                     | 11.7                     | 6.9            | 100.0        |
| Wisconsin            | 69,754                              | 11,357                  | 9.1            | 32.1                    | 28.9                     | 16.7                     | 13.2           | 100.0        |
| Wyoming              | 5,218                               | 10,917                  | 13.5           | 31.5                    | 25.7                     | 15.3                     | 14.0           | 100.0        |
| <b>Total</b>         | <b>4,643,006</b>                    | <b>10,272</b>           | <b>15.2</b>    | <b>32.1</b>             | <b>23.8</b>              | <b>13.5</b>              | <b>15.4</b>    | <b>100.0</b> |

HUD = U.S. Department of Housing and Urban Development.

Notes: Household data reported in the Public and Indian Housing Information Center, or PIC, and Tenant Rental Assistance Certification System, or TRACS, datasets. Excludes data from American Samoa and the Northern Mariana Islands and includes data from areas, such as Chicago and New York City, not reported in low-income housing tax credit tables.