Department of Housing and Community Development
Notice of Funding Availability
Winter 2016
Affordable Housing Competition for Rental Projects

The Department of Housing and Community Development (DHCD) is pleased to announce the start of the winter 2016 affordable housing competition for rental projects. The deadline for submitting applications to the winter 2016 competition will be Friday, March 11, 2016. On or before that date, DHCD will accept applications from sponsors whose projects were approved in January 2016 through the Department's pre-application process. Only projects with January 2016 pre-approvals will be considered during the winter 2016 competition. All applications to the winter 2016 competition must be submitted on-line using the Department's Mass OneStop+ web-based application. Each sponsor will be limited to no more than two project applications for available resources.

It is of great importance to the Baker Polito Administration to provide housing, not shelter, as a solution to homelessness. DHCD's resources are critically important to this effort. Consistent with the Administration's goal of eliminating homelessness in Massachusetts, DHCD, through this NOFA and the winter 2016 competition, will give priority in funding to projects that provide affordable housing for homeless families or individuals. In order to meet this priority, a sponsor must reserve at least 10% of the units in the project for homeless families or individuals earning less than 30% of area median income.

It is also of great importance to the Baker Polito Administration to promote the development of mixed-income housing with workforce and/or market rate units as well as affordable units. Sponsors who are interested in structuring mixed-income proposals should contact the Department's Division of Housing Development to discuss their projects.

The tax credit and subsidy resources available during the winter 2016 competition include the following:

- Federal Low Income Housing Tax Credits (LIHTC)
- Massachusetts State Low Income Housing Tax Credits
- HOME Investment Partnerships Program (HOME) monies in combination with Low Income Housing Tax Credits or as a funding source without tax credits
- Housing Stabilization and Investment Trust Fund (HSF) monies in combination with Low Income Housing Tax Credits or as a funding source without tax credits
- Capital Improvement & Preservation Trust Fund (CIPF) monies in combination with Low Income Housing Tax Credits or as a funding source without tax credits
- Housing Innovations Fund (HIF) monies as a funding source without Low Income Housing Tax Credits unless the sponsor intends to provide homeless units in conjunction with appropriate supportive services
- Facilities Consolidation Fund (FCF) monies in combination with Low Income Housing Tax Credits or as a funding source without tax credits. Although these

monies are available on a rolling basis, developers also may submit applications for FCF during this funding round.

- Community-Based Housing (CBH) monies in combination with Low Income Housing Tax Credits or as a funding source without tax credits. The regulations and guidelines for this program are available on DHCD's website at: http://www.mass.gov/hed/docs/dhcd/hd/cbh/proguidelines.pdf
- Commercial Area Transit Node Housing Program (CATNHP/TOD) monies in combination with Low Income Housing Tax Credits or as a funding source without tax credits.
- Affordable Housing Trust Fund (AHTF) monies in combination with Low Income Housing Tax Credits or as a funding source without tax credits.

The Department reserves the right to restrict the overall amount of funding committed during the winter 2016 competition, based on the availability of federal and state resources supporting each program. All resources have been significantly oversubscribed in recent competitions. The Department expects demand to significantly exceed supply in the winter 2016 competition as well.

In addition, developers should note that the final amount available for the federal HOME program administered by DHCD has not yet been established by Congress and the United States Department of Housing and Urban Development (HUD).

Developers seeking HOME, HSF, CIPF, FCF, CBH, CATNHP/TOD or AHTF funds may apply for these funds in combination with tax credits or as a funding source without tax credits. Developers seeking HIF may not apply for tax credits during this competition unless they intend to provide homeless units in conjunction with significant supportive services. The availability of state resources such as HSF, CIPF, HIF, FCF, CBH, CATNHP/TOD or AHTF funds, provided from the proceeds of the Commonwealth's general obligation bonds, is at all times subject to decisions on the bond accounts made from time to time by the Secretary of Administration and Finance. Developers seeking HOME, HSF, CATNHP/TOD, or CIPF for projects located in HOME entitlement/consortium communities should note that a local contribution of funds is required. Local match also is required for federal or state tax credit projects. Further information is available from the Division of Housing Development at (617) 573-1300.

Applicants also should contact Department staff to discuss the likely limits on all rental resources. DHCD has established $100,000 as the subsidy limit per affordable unit for the winter 2016 rental round. It is the Department's expectation that sponsors will limit their request for DHCD funding subsidy to $100,000 per affordable unit. Non-profit sponsors of projects that primarily or exclusively serve persons with disabilities, veterans, or homeless families or individuals should contact DHCD staff directly to discuss the subsidy limit for their projects.

Developers who intend to apply for tax credits and/or subsidy during the winter 2016 competition must simultaneously identify and apply for any other DHCD resource included in the financing package. DHCD will not accept applications for additional resources at a later date from sponsors applying for tax credits and/or subsidy during this competition. **Interested sponsors should refer to the program restrictions and additional application requirements summarized on pages 4-11 of this NOFA.**

Project-Based Assistance:

Some sponsors of rental projects may apply for an allocation of Section 8 project-based voucher assistance from DHCD, in accordance with all Section 8 project-based voucher regulations found at 24 CFR Part 983, published October 30, 2005 including revisions made effective July 25, 2014 and all DHCD PBV Administrative Plan requirements, as they may be amended from time to time, which can be found on DHCD's web page at:
http://www.mass.gov/hed/docs/dhcd/ph/s8plans/sec8administrativeplan.pdf

In addition, DHCD will make project-based assistance available to certain projects through the Massachusetts Rental Voucher Program (MRVP). Please refer to pages 7-9 of this NOFA.

I. Pre-Application and Application Deadlines

The deadline for submission of pre-applications to the winter 2016 affordable housing competition for rental projects will be Thursday, December 17, 2015. DHCD will accept no more than two pre-applications from each developer. All applications must be received at the Department on or before that date. **Pre-applications must be submitted using Mass OneStop+, DHCD's on-line financing application. The link to the application system is:** https://massonestopplus.intelligrants.com. Sponsors should prepare pre-applications consistent with DHCD's stated priority for projects that include 10% of the total units reserved for homeless families or individuals.

The deadline for submission of all applications to the winter 2016 affordable housing competition for rental projects will be Friday, March 11, 2016. All applications must be received at the Department on or before that date. Sponsors may apply in March only if the Department approves their pre-applications in January 2016.

All applications must be submitted using Mass OneStop+, DHCD's on-line financing application. As indicated, the link to the application system is: https://massonestopplus.intelligrants.com. Applicants must also submit to DHCD one original hard copy of the Mass OneStop+ on-line application, including 11 x17 plans, by close of business on Monday, March 14, 2016. **Applications submitted after the deadlines of March 11, 2016, for online submissions and March 14, 2016, for hard copy submissions will not be accepted by DHCD.**

Application materials must be delivered to:

Department of Housing and Community Development
Division of Housing Development
100 Cambridge Street, Suite 300
Boston, MA 02114
Attn: Bertha Borin

II. Eligible Applicants

Each of the funding resources available during the winter 2016 competition has guidelines and/or regulations describing eligible applicants. In general, eligible applicants are as follows:

- LIHTC (federal and state): for-profit or non-profit developers
- HOME: for profit or non-profit developers, or municipalities in partnership with for-profit or non-profit developers
- HSF: for profit or non-profit developers, or municipalities in partnership with for-profit or non-profit developers
- CIPF: for-profit or non-profit developers
- HIF: non-profit developers
- FCF: non-profit or for-profit developers
- CBH: non-profit or for-profit developers
- CATNHP/TOD: for-profit or non-profit developers, or municipalities in partnership with for-profit or non-profit developers
- AHTF: for profit or non-profit developers

For additional information on eligible applicants for each resource, please contact the Division of Housing Development staff at (617) 573-1300.

III. Specific Program Guidelines for the Winter 2016 Competition

DHCD has stated in this NOFA that it will give priority for projects that will produce or preserve at least 10% of the total units for homeless families or individuals. DHCD also is encouraging the development of mixed-income projects. Certain guidelines and/or regulations exist for each funding resource available during DHCD's winter 2016 competition. Sponsors should review copies of the current program-specific guidelines and/or regulations before preparing their funding applications. Sponsors who intend to prepare applications for tax credits in combination with other DHCD resources should take note of the following specific program standards:

- *Federal Low Income Housing Tax Credits*: Please refer to the draft 2016 Tax Credit Qualified Allocation Plan (QAP). The draft QAP will be posted on the LIHTC page of DHCD's website at: http://www.mass.gov/hed/housing/affordable-rent/low-income-housing-tax-credit-lihtc.html

  Please note that all 9% credit project sponsors should assume that the applicable percentage for the rehabilitation credit (also known as the 70% Present Value Credit) will be 7.48%, which is the applicable percentage as of November 2015.

- *Massachusetts State Low Income Housing Tax Credits:* Please refer to the draft 2016 QAP. In addition, please note that demand for the state low-income housing tax credit has increased dramatically during the most recent rental competitions. DHCD anticipates that demand will remain strong during 2016. Sponsors of

applications seeking state LIHTC during the winter 2016 competition should note the following limitations.

The Department strongly encourages project sponsors to limit state credit requests as follows:

- $ 400,000 for projects with 40 or fewer units
- $ 700,000 for projects with 41 to 60 units
- $1,000,000 for projects greater than 60 units

DHCD also strongly encourages all sponsors to limit state credit requests to $10,000 to $12,000 per unit.

On a case-by-case basis, the Department may permit applications for higher state LIHTC requests. However, DHCD is likely to entertain such requests only for certain major impact projects. Sponsors should contact Department staff to discuss such requests.

- *HOME Investment Partnerships Program:* In general, $750,000 to $1,000,000 is the maximum amount available per project; $50,000 is the maximum amount available per affordable unit in HOME entitlement/consortium communities. In non-entitlement or non-consortium communities, the maximum amount available per affordable unit is $65,000. Applications for projects located in municipalities that receive HOME funds directly from HUD must include matching funds (i.e. HOME, CDBG) as a funding source for the project. Each application must be signed by the chief elected official of the community in which the project is located. All sponsors should note that the recent HOME program reductions at the federal level --approximately 50% less for Massachusetts as compared to 2011 -- continue to affect the number of HOME awards the Department can make. Applicants also should note current HUD HOME requirements referenced in the HOME Final Rule, as updated July 24, 2013. Projects seeking HOME funds must undergo the HUD environmental review process, which includes notice to the State Historic Preservation Office and the Tribal Preservation Office. Sponsors of potential HOME projects must not undertake any choice limiting actions, as defined by HUD, until the HUD environmental review is complete. Eligible HOME Community Housing Development Organizations (CHDOs) with potential HOME CHDO projects are strongly encouraged to apply for funds.

- *Housing Stabilization Fund monies:* In general, $750,000 to $1,000,000 is the maximum amount available per project; $50,000 is the maximum amount available per affordable unit in HOME entitlement/consortium communities. In non-entitlement or non-consortium communities, the maximum amount available per affordable unit is $65,000. Each application must be signed by the chief elected official of the community in which the project is located. Applications for projects located in municipalities that receive HOME funds directly from HUD must include matching funds as a funding source for the project.

- *Capital Improvement and Preservation Fund:* CIPF is intended to help preserve and improve projects where the prepayment of a state or federally-assisted mortgage would lead or has led to the termination of a use agreement for low income housing. CIPF funds are subject to the bond expenditure cap established for DHCD by the Executive Office of Administration and Finance. The maximum amount of CIPF available per project is $40,000 per unit for projects with more than 25 units with a typical per project maximum of $2,000,000. The maximum amount of CIPF available per project is $50,000 per unit for projects with 25 units or less with a typical per project maximum of $1,250,000. Sponsors also must obtain a commitment of funds from the community in which the project is located. Interested parties should contact the Division of Housing Development staff to obtain more information.

- *Housing Innovations Fund*: $500,000 is the maximum amount of HIF typically available to a project. $750,000 to $1,000,000 is the maximum amount of HIF typically eligible to a project that primarily or exclusively serves homeless individuals or families. Sponsors also should note that HIF, by statute, can support no more than 50% of the total development cost per HIF unit.

- *Facilities Consolidation Fund:* In accordance with statute, requests for FCF may not exceed 50% of the total development cost of the project (or of the total development cost of eligible units in a larger project). Please note that FCF funds are only available to projects or units within larger projects available for the exclusive use of the Departments of Mental Health or Developmental Services. **Sponsors must include in the Mass OneStop+ application a certification from the central office of DDS or DMH that the project is part of the Facilities Consolidation Plan.**

- *Community Based Housing:* A request for CBH funding for a project may not exceed the lesser of: 1) $750,000; or 2) 50% of total development costs (or of the total development cost of eligible units in a larger project). **Sponsors of projects seeking CBH funds must include in their applications a letter of support for the project and for the population to be served from the Massachusetts Rehabilitation Commission.**

- *Commercial Area Transit Node Housing Program:* $50,000 per affordable unit is the CATNHP/TOD maximum. $750,000 to $1,000,000 typically is the per project maximum for CATNHP/TOD. Each sponsor may submit only one request for CATNHP/TOD funding, and no more than one application will be accepted from one community in a funding round. Projects must be located in proximity to transit, defined as "within .25 (1/4) miles of an existing Transit Station or Planned Transit Station".

- *Affordable Housing Trust Fund:* In general, $1,000,000 is the maximum available per project; $50,000 is the maximum amount available per affordable unit. The

level and type of assistance provided by AHTF to a project must be the minimum amount necessary to achieve the desired degree of affordability.

- *Section 8 Project-Based Voucher (PBV) Assistance*: A maximum of 140 Section 8 PBV vouchers will be made available as part of this funding round. Successful applicants must be approved for at least one other available source of funding from a DHCD funding round in order to be eligible for PBV assistance. Projects located within the City of Boston may apply for PBV vouchers if the project has set aside 20% or more of its units for homeless families, and will use the PBV voucher on some or all of such set-aside units. In addition, City of Boston projects funded with Community Based Housing (CBH) or Facilities Consolidation Funds (FCF) may apply for PBV vouchers (maximum of 12 PBVs per funding round). DHCD expects these PBV vouchers to be available in fall 2017. All PBV voucher reservations are subject to available funding from HUD and DHCD. PBV contract authority can be requested for up to 15 years, with the option to renew. PBV funds will be used to pay the owner a portion of the monthly rent on behalf of eligible households whose incomes must generally be at or below 30% of the area median income (AMI), and in no case can exceed 50% of AMI. No demolition or construction can begin until an Agreement to enter into a Housing Assistance Payments (AHAP) contract is signed; therefore, projects that are already in construction cannot receive PBV assistance. Prior to AHAP: 1) a subsidy layering review for projects with any form of federal, state or local housing assistance, including tax credits and tax concessions, must be approved by HUD or a HUD designated agency; and 2) an environmental review performed in accordance with 24 CFR 58 must also be completed and approved by HUD.

  Unit and Project Size Requirement:
  1) **Family** units of 2 or more bedrooms;
  2) A limit of the lesser of 8 PBVs per project, or 25% of the total project units as PBVs;
  3) All PBV units must have a private bath; and
  4) PBV units cannot be used in group residences or shared housing arrangements.

At the discretion of DHCD, up to 20 of the 140 PBVs may be awarded to units not meeting these criteria. DHCD reserves the right to limit the number of vouchers awarded to each project.

Owners will be responsible for maintaining a PBV waiting list and selecting tenants in accordance with a DHCD-approved tenant selection plan.

Sponsors must agree to comply with all Section 8 project-based voucher regulations found at 24 CFR Part 983, published October 30, 2005, including revisions made effective July 25, 2014 (published 6/25/2014), and all DHCD PBV Administrative Plan requirements, as they may be amended from time to time, which can be found on DHCD's web page at:
http://www.mass.gov/hed/docs/dhcd/ph/s8plans/sec8administrativeplan.pdf

Interested sponsors should immediately contact both the Division of Housing Development at (617) 573-1300 and the Bureau of Rental Assistance at (617) 573-1217 for further information about the Section 8 project-based option and how to structure the development and operating pro formas which must be submitted as part of the Mass OneStop+ application due on Friday, March 11, 2016.

Massachusetts Rental Voucher Program (MRVP), Project Based Voucher (PBV) Assistance: A maximum of 100 MRVP PBVs will be made available as part of this funding round. Successful applicants must be approved for at least one other available source of DHCD funding in the spring rental round in order to be eligible for MRVP PBV assistance. MRVP is a state-funded program and is not part of DHCD's federal Section 8 PBV program. MRVP has separate regulations and guidelines to which developers must adhere. Owners will be responsible for maintaining a PBV waiting list in coordination with the Administering Agency and selecting tenants in accordance with a DHCD-approved tenant selection plan.

DHCD expects these PBVs to be available in fall 2017. All PBV reservations are subject to available funding from DHCD. PBV contract authority can be requested for up to 15 years, with the option to renew. PBV funds will be used to pay the owner a portion of the monthly rent on behalf of eligible households whose incomes must be at or below 50% of AMI. The contract rent for these units will be set at the lesser of 60% of AMI rents or FMR. No demolition or construction can begin until a pre-leasing agreement contract is signed; therefore, projects that already are in construction cannot receive PBV assistance.

Unit and Project Size Requirement:

1) Family units of 2 or more bedrooms;
2) A limit of the lesser of 8 PBVs per project, or 25% of the total project units as PBVs;
3) All PBV units must have a private bath; and
4) PBV units can be used in group residence or shared housing arrangements, although private baths are required.

At the discretion of DHCD, up to 20 of the 100 PBVs may be awarded to units not meeting these criteria. DHCD reserves the right to limit the number of vouchers awarded to each project.

Owners will be responsible for maintaining a PBV waitlist and selecting tenants in accordance with a DHCD approved tenant section plan.

Sponsors must agree to comply with all MRVP PBV regulations found at: http://www.mass.gov/hed/economic/eohed/dhcd/legal/regs/

Interested sponsors should immediately contact both the Division of Housing Development at (617) 573-1300 and the Bureau of Rental Assistance at (617) 573-1141 for further information about the MRVP program.

IV. Competitive Evaluation Criteria:

All applications will be evaluated first to determine that at least 10% of the units in the project will be reserved for homeless families or individuals. All applications also will be evaluated according to criteria that apply to DHCD programs from which funding is sought. The Commonwealth's commitment to the principles of sustainable development is reflected in the Division's programs and policies. Sponsors should note that consistency with the Commonwealth Sustainable Development Principles is a threshold requirement for all projects. Sponsors applying for resources other than tax credits also must provide market study information, as well as Appendices I and J of the QAP. The specific criteria for tax credit applications are set forth in the 2016 draft Qualified Allocation Plan. To review the draft Qualified Allocation Plan, please visit the LIHTC page of the DHCD website:

http://www.mass.gov/hed/housing/affordable-rent/low-income-housing-tax-credit-lihtc.html

In general, the evaluation criteria for all applications include, but are not limited to, the following:

- percentage of units to be reserved for homeless families or individuals (10% minimum)
- strength of overall concept
- strength of development team
- total request for state subsidy (exclusive of tax credits) (subsidy request should not exceed $100,000/unit)
- evidence of market feasibility
- evidence of satisfactory progress on projects previously funded with DHCD resources
- demonstrated need for project in the target neighborhood
- appropriate design for the project that promotes green building standards and increased accessibility
- provision of units for individuals or households earning less than 30% of AMI, including those making a transition from homelessness
- provision of units for persons with disabilities
- appropriate scope of construction for the project
- appropriate total development costs for properties included in proposal
- financial viability of the project
- degree of local support, including local funding commitments
- evidence of readiness to proceed
- degree to which the project maximizes sustainable development principles

It is important to note that sponsors of applications to the winter 2016 rental competition must be in good standing with DHCD with respect to any and all other affordable housing projects, supported by DHCD resources, with which they are involved. DHCD may elect not to review applications from sponsors who are not in good standing with the Department with respect to other projects.

Please refer to page 11 of this NOFA for application requirements. Please contact DHCD's Division of Housing Development at (617) 573-1300 with any questions related to the winter 2016 affordable housing competition for rental projects.

V. Performance Measurement and Fair Housing Data Collection:

Applicants seeking DHCD funds should note the following: If they receive funding, they must comply with HUD approved performance measurement standards and data collection requirements and with Commonwealth of Massachusetts fair housing data collection requirements. Please refer to Attachment A for Massachusetts' Fair Housing Mission Statement and Principles.

VI. Application Requirements

All applications must be submitted on-line at https://massonestopplus.intelligrants.com, using the Mass OneStop+ application. All online applications must be submitted on or beforethe close of business on Friday, March 11, 2016. Sponsors who need assistance in signing up for training or logging in should contact Bertha Borin at DHCD at 617-573-1309. In addition to on-line submission, one original hard copy of the Mass OneStop+ application, including 11 x 17 plans, must be submitted (in a three-ringed binder and tabbed by section) to DHCD, Division of Housing Development, 100 Cambridge Street, Suite 300, Boston, MA 02114, no later than the close of business on Monday, March 14, 2016.

VII. Pre-Application and Application Fees

Pre-application fees are due from all applicants who submit pre-applications by close of business on Thursday, December 17. The pre-application fee is $1,000 for each project sponsored by a for-profit and $500 for each project sponsored by a non-profit. Pre-application fees are non-refundable. Please note that sponsors are limited to no more than two pre-applications.

Application fees for the March 2016 rental round are due with Mass OneStop+ submissions for several of the funding resources currently available. The fee schedules for the funding resources are as follows:

Low Income Housing Tax Credits only:
All tax credit applicants must pay a portion of the tax credit fee when the application is submitted to DHCD. This fee is non-refundable. Application fee checks for tax credit projects should be made payable to the **Department of Housing and Community Development**. The fees due with the application submission are as follows:

Projects sponsored by non-profits:	$1,050
Projects containing 20 units or fewer	$1,050
All other projects	$5,250

Low Income Housing Tax Credits in combination with other DHCD resources:
The only application fees due are the tax credit application fees listed above. No additional fees are due.

HOME, HSF, CATNHP/TOD, or CIPF funds as a source exclusive of tax credits:
Applicants seeking HOME, HSF, CATNHP/TOD or CIPF funds, but not tax credits, must pay an application fee at the time of submission. The fee is non-refundable. Checks should be made payable to the **Massachusetts Housing Partnership Fund**. The fees are as follows:

Projects sponsored by non-profits	$ 450
Projects sponsored by for-profits	$1,250

HIF, FCF, or CBH as a source exclusive of tax credits:

No application fee is required.

Attachment A

Massachusetts Fair Housing Mission Statement and Principles

The mission of DHCD through its programs and partnerships is to be a leader in creating housing choice and providing opportunities for inclusive patterns of housing occupancy to all residents of the Commonwealth, regardless of income, race, religious creed, color, national origin, sex, sexual orientation, age, ancestry, familial status, veteran status, or physical or mental impairment.

It shall be our objective to ensure that new and ongoing programs and policies affirmatively advance fair housing, promote equity, and maximize choice. In order to achieve our objective, we shall be guided by the following principles:

1. **Encourage Equity.** Support public and private housing and community investment proposals that promote equality and opportunity for all residents of the Commonwealth. Increase diversity and bridge differences among residents regardless of race, disability, social, economic, educational, or cultural background, and provide integrated social, educational, and recreational experiences.

2. **Be Affirmative.** Direct resources to promote the goals of fair housing. Educate all housing partners of their responsibilities under the law and how to meet this important state and federal mandate.

3. **Promote Housing Choice.** Create quality affordable housing opportunities that are geographically and architecturally accessible to all residents of the commonwealth. Establish policies and mechanisms to ensure fair housing practices in all aspects of marketing.

4. **Enhance Mobility.** Enable all residents to make informed choices about the range of communities in which to live. Target high-poverty areas and provide information and assistance to residents with respect to availability of affordable homeownership and rental opportunities throughout Massachusetts and how to access them.

5. **Promote Greater Opportunity.** Utilize resources to stimulate private investment that will create diverse communities that are positive, desirable destinations. Foster neighborhoods that will improve the quality of life for existing residents. Make each community a place where any resident could choose to live, regardless of income.

6. **Reduce Concentrations of Poverty.** Ensure an equitable geographic distribution of housing and community development resources. Coordinate allocation of housing resources with employment opportunities, as well as availability of public transportation and services.

7. **Preserve and Produce Affordable Housing Choices.** Encourage and support rehabilitation of existing affordable housing while ensuring that investment in new housing promotes diversity, and economic, educational, and social opportunity. Make housing

preservation and production investments that will create a path to social and economic mobility.

8. **Balance Housing Needs.** Coordinate the allocation of resources to address local and regional housing need, as identified by state and community stakeholders. Ensure that affordable housing preservation and production initiatives and investment of other housing resources promote diversity and social equity and improve neighborhoods while limiting displacement of current residents.

9. **Measure Outcomes.** Collect and analyze data on households throughout the housing delivery system, including the number of applicants and households served. Utilize data to assess the fair housing impact of housing policies and their effect over time, and to guide future housing development policies.

10. **Rigorously Enforce All Fair Housing and Anti-Discrimination Laws and Policies.** Direct resources only to projects that adhere to the spirit, intent, and letter of applicable fair housing laws, civil rights laws, disability laws, and architectural accessibility laws. Ensure that policies allow resources to be invested only in projects that are wholly compliant with such laws.