

**SUPER NOFA - SECTION 202  
FY 2009**

**HIGHLIGHTS FROM THE EMAD PERSPECTIVE**

The August 20, 2009 Final NOFA for FY 2009 submissions – as presented on the [hud.gov](http://hud.gov) website - Section III (Eligibility Information), C. 2 (Threshold Requirements for Funding Consideration) b.(1) (page 13) states: *“There must be a market need for the number of units proposed in the area of the project location. If HUD determines that there is not sufficient sustainable demand for additional units without longer term adverse impact on existing federally assisted housing, the proposed project must be rejected”.*

Further, IV. B.2.c. Part III (1) (a) Evidence of need for supportive housing (page 40 of the NOFA) requires applicants to *“Include a description of the category or categories of elderly persons the housing is intended to serve and evidence demonstrating sustained effective demand for supportive housing for that population in the market area to be served, taking into consideration the occupancy and vacancy conditions in existing federally assisted housing for the elderly (HUD and the Rural Housing Service (RHS)) e.g., public housing, state or local data on the limitations in activities of daily living among the elderly in the area; aging in place in existing assisted rentals; trends in demographic changes in elderly population and households; the numbers of income eligible elderly households by size, tenure and housing condition; the types of supportive services arrangements currently available in the area; and the use of such services as evidenced by data from local social service agencies or agencies on aging.”*

**Evidence used to determine sustained effective demand:**

- information on positive trends in demographic changes in elderly population and households and data on the numbers of income eligible elderly households by size, tenure and housing condition.
- information on the numbers and types of **ALL** existing comparable Federally-assisted housing units for the elderly (HUD and RHS);
- any comparable and competitive age-restricted rental units in LIHTC financed developments with rent restrictions at or below the very low-income limits;
- current occupancy in **ALL** comparable assisted housing and recent market experience, including turnover of units and the number of persons on any waiting lists;
- **ALL** comparable assisted housing for the elderly under construction or for which fund reservations have been issued;
- information on the possible harm to existing projects in the same housing market area by any additional new construction or substantial rehabilitation; and,

**Evidence of Possible Lack of Demand:**

- A projection of long-term decline in the age-cohorts of the target population that comprise the major segments of demand/need for assisted rental housing, principally, one person low-income renters with housing conditions, age 75 and older.
- Persistent high vacancies throughout developments in the market area. Projects failing to reach sustainable occupancy.

- Existing developments unable to re-lease units in a reasonable time if tenants move out to newer developments. New projects are filling at the expense of existing ones.
- Widespread use of age-waivers to increase occupancy in existing developments and/or in developments in lease-up.
- An overall vacancy rate in assisted housing (of the type proposed) of greater than 7 percent for longer than 12 months.
- The number of assisted housing units already approved or under construction represents a significant proportion of the income-eligible elderly with conditions.

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### Working with Data sources

#### **2000 Census Special Tabulations applicable to Section 202**

The most accurate estimate of potential occupancy is the number of very-low income, 1-person renter households, age 75 and over with housing conditions. You may use the following database to obtain the data for your county or for most cities with a Census 2000 population greater than 50,000:

[http://www.huduser.org/ast/scripts/odbc.exe/ast/select\\_year.htm](http://www.huduser.org/ast/scripts/odbc.exe/ast/select_year.htm)

#### **Revised 1999 income limits**

The revised 1999 income limits are used in determining the very-low income amount for a 1-person household when using 2000 Census data. That figure can be found at:

<http://www.huduser.org/datasets/il/fmr99rev/index.html>

Scroll down to the map at the bottom of that page and click on your state to obtain the appropriate income limits to apply to the Census Special Tabulations. A county is listed based on its metropolitan/non-metropolitan status in 2000. A county that was added to a metropolitan after April 1, 2000 will be listed as non-metropolitan in this data. Areas defined as metropolitan in 2000 are listed first. The first income amount listed on the *Very-Low Income* line is the applicable 1-Person limit.

If you need assistance in interpolating the data within an income bracket in the Special Tabulations data, please contact the Economic and Market Analysis Division:

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