

FY22 Section 202 NOFO: Site and Neighborhood Standards Webinar Q&A

October 27, 2022

No.	Question	Answer
1.	What is a minority concentration area?	<p>Per the Section 202 NOFO, the term “area of minority elderly concentration” is defined as one where either of the following statistical conditions exists:</p> <ul style="list-style-type: none"> • The percentage of elderly persons (i.e., 62 years of age or older) of a particular racial or ethnic minority within the area of the site is at least 20 percentage points higher than the percentage of elderly persons of that minority group in the housing market as a whole; or • The total percentage of elderly persons of all racial or ethnic minorities within the area of the site is at least 20 percentage points higher than the total percentage of elderly minorities in the housing market area as a whole. <p>Generally speaking, if there is a particular elderly racial or ethnic minority in one census tract that is 20 percentage points higher than that same elderly minority or ethnic group in the Metropolitan Statistical Area, then it would be considered an area of minority elderly concentration.</p> <p>*Readers should be aware the Department is evaluating the definition of “area of minority concentration” to determine an updated definition which best effectuates the intent and purpose of the site and neighborhood standards regulations.</p>
2.	We are close to a large homeless shelter - not sure they are recorded on the census. It would be good to build some affordable housing.	Individuals without conventional housing or who may be experiencing homelessness are included in census data. You can learn more about this here .
3.	Our site is not in an AMEC, however it is near one. We understand we need to explain how the neighborhoods are distinct. However the adjacent AMEC is also being revitalized.	Yes. Any additional local knowledge and/or local data provided to support your application will be reviewed and taken into consideration.

	Should we discuss this as well, or just focus only on the neighborhood where the project is located?	
4.	To clarify, only New Construction should use the Elderly Minority Concentration tool in the Toolkit, correct?	Correct.
5.	My site in an area of minority concentration, but also an opportunity zone. Does the opportunity zone designation override the minority concentration designation?	No, Opportunity Zones do not override the elderly minority concentration designation. If you wish to claim an exception, you must provide evidence of sufficient, comparable opportunities and/or overriding housing need.
6.	What are the developer qualification requirements?	The development team will be scored on its experience in Rating Factor 3. You may also wish to view the NOFO Overview and Scoring webinar recordings posted on the Funding Opportunities page .
7.	Are there multiple ways of determining an area of elderly minority concentration, e.g., by site address, census, tract, zip code, county or congressional district?	The Section 202 Minority Elderly Concentration Analysis Tool, which uses census tracts, should be used when determining whether your site is in an Area of Minority Elderly Concentration. If you believe the tool does not accurately represent the neighborhood of the proposed project, you may propose an alternative geography.
8.	When using the Elderly Minority Concentration tool, we noticed that the data included is from 2010. Our tract has had considerable demographical change since 2010. Is there any exception argument that can be made that the data is not representative for the neighborhood currently?	The Section 202 Minority Elderly Concentration Analysis Tool report must be provided with your application. However, if you wish to provide additional local knowledge and data it will be reviewed and taken into consideration. For example, while we understand the Tool is still using 2010 Census Data, we encourage applicants to refer to the U.S. Census Bureau website for more recent data that can be used in support of their applications.
9.	Our neighborhood has been subject to ongoing change from gentrification. However, gentrification trends don't really show up on the report given the movement to the area is primarily driven by younger people. Is this form	Although the Section 202 Minority Elderly Concentration Analysis Tool report must be provided with your application, applicants may provide additional local knowledge and data which HUD will review and take into consideration. For example, while we understand the Tool is still using 2010 Census Data, we encourage applicants to refer to the U.S. Census Bureau website for more recent data that can be used in support of their applications.

	of demonstrated exception allowed from HUD.	
10.	I have used the HUD tool to locate Minority Elderly Concentration for the site. It seems quite inaccurate. How can I research on my own to find out if the site is in Minority Elderly Concentration?	The Section 202 Minority Elderly Concentration Analysis Tool report must be provided with your application. However, if you wish to provide additional local knowledge and data it will be reviewed and taken into consideration. For example, while we understand the Tool is still using 2010 Census Data, we encourage applicants to refer to the U.S. Census Bureau website for more recent data that can be used in support of their applications.
11.	Does your application receive more points if the project is located IN an area of Minority Elderly Concentration?	No. Points are not given for a project's location in an area of minority elderly concentration. A new construction project cannot be built in an area of minority elderly concentration unless an exception applies.
12.	In last year's 202 NOFO, it mentioned that HUD may review draft exceptions before application submission. Is HUD still offering this opportunity?	No. That opportunity will not be available for this year's NOFO.
13.	Can you provide some additional information on requirements for sites that are NEAR but not in an area of MEC? Thank you.	In this instance, you must submit the report from the Section 202 Minority Elderly Concentration Analysis Tool showing the site is in a census tract that is not minority elderly concentrated and provide supporting documentation that the boundaries of the census tract are consistent with local community understanding of the neighborhood. Please refer to question 42 of the FAQs for more information.
14.	Will you review and determine if a site is eligible for one of the exceptions BEFORE the application deadline?	No. We can only determine whether a site meets one of the exceptions after reviewing the applicant's supporting documentation.
15.	Revitalization Report uses data that is now about 6 years old. Are the data used in the Revitalization Report weighted more or less than evidence of current investment?	No. If you provide data in addition to the Revitalization Report we will take all information provided into consideration when reviewing the application.
16.	Given the severe housing need in both racial concentration and not a racial concentration areas, will HUD	There are no plans to remove the site and neighborhood requirements at this time.

	consider removing this requirement in the future?	
17.	Can you discuss sites that are not in MEC but are adjacent to an area of MEC?	In this instance, you must submit the report from the Section 202 Minority Elderly Concentration Analysis Tool showing the site is in a census tract that is not minority elderly concentrated and provide supporting documentation that the boundaries of the census tract are consistent with local community understanding of the neighborhood. Please refer to question 42 of the FAQs for more information.
18.	Could you talk about Alternative Geography for sites NEAR MECs, in lieu of an exception argument?	In this instance, you must submit the report from the Section 202 Minority Elderly Concentration Analysis Tool showing the site is in a census tract that is not minority elderly concentrated and provide supporting documentation that the boundaries of the census tract are consistent with local community understanding of the neighborhood. Please refer to the FAQs for more information. However, if you are claiming an alternative geography, it is recommended you also claim one or more exception(s) in the case that HUD does not find the proposed alternative geography to be acceptable.