

CHOICE NEIGHBORHOODS DEMONSTRATION
ONE-FOR-ONE REPLACEMENT CRITERIA AND HARD-UNIT EXCEPTION
Last Updated – July 16, 2010

For the Choice Neighborhoods Demonstration, all public and assisted housing units will be required to be replaced one-for-one with a “hard unit” as described in the Choice Neighborhoods Pre-Notice (posted at www.hud.gov/cn) and in the Notice of Funding Availability (forthcoming). HUD is instituting this requirement as part of a policy to preserve public and assisted housing units in most housing markets.

However, HUD also recognizes that there are some housing markets where vouchers are a better alternative for some extremely low-income households than hard units. In markets where rents are low and vacancy rates are persistently high, vouchers support mobility for extremely low-income families, allowing them to escape concentrated poverty and access better neighborhoods not often available with hard units such as public housing or multifamily assisted housing. In addition, most of these markets tend to have relatively low market rents making the voucher a much more cost-efficient option than replacing hard units. This frees up capital for replacing hard units in the tighter housing markets. That noted, the Notice of Funding Availability for Choice Neighborhoods will encourage all applicants to replace as many of their demolished and disposed of units as possible with hard units, even if the exception request is approved.

A potential Choice Neighborhoods applicant may request an exception to the 100 percent replacement requirement and propose replacing up to 50 percent of the public housing and/or assisted housing dwelling units to be demolished/disposed of with tenant-based vouchers instead of hard units. To be granted this exception by HUD, the area of the Choice Neighborhoods development must meet all three of the following requirements:

- (1) Be in a county with a currently and historically soft rental housing market for low-income renters. HUD has defined these counties as those where the county rental vacancy rates for units affordable to low-income households were greater than 7.3% in 2000 and greater than 9.2% in 2005-2007.¹
- (2) Be in a Core Based Statistical Area (CBSA) or non-CBSA County where vouchers currently in use are primarily in lower poverty neighborhoods. Data from PIC shows the location of current housing choice voucher holders in the Core Based Statistical Area (CBSA) (or county outside of CBSA). To qualify on this standard, the median neighborhood poverty rate for a voucher holder in the CBSA (or county outside of a CBSA) must be 20% or less. In other words, at least 50% of voucher holders must be in neighborhoods with 20% poverty rate or less. An agency may request that this standard only be applied for the agency proposed to operate the voucher program as opposed to all agencies in the CBSA.
- (3) High voucher success rate. The applicant will be required to provide data that shows that the agency that would administer the replacement vouchers has a success rate of 80% or higher. That is, a

¹ In 2000, 7.3% represents the national mean vacancy for units affordable to low-income households and 9.2% represents the 40th percentile rate of counties in 2005-2007 (American Community Survey 3-year average). While HUD is using the national mean and the 40th percentile rental vacancy as its cut-offs to allow for some variance over time, those cut-offs are consistent with market analysts views on loose to very loose rental markets. As part of an analysis of voucher success rates in 2001, analysts asked experts in various local housing markets to arrive at a consensus vacancy range for market softness. That research identified markets as very tight (less than 2 percent), tight (2 to 4 percent), moderate (4 to 7 percent), loose (7 to 10 percent), or very loose (more than 10 percent). (See: Finkel and Buron. Study on Section 8 Voucher Success Rates: Volume 1, November 2001, page 3-17.)

minimum of 80% of households issued vouchers are successful at leasing units within 120 days. To meet this requirement the agency will need to provide a file to HUD that shows all vouchers issued in the prior 18 months and the outcome associated with that issuance. In addition, the applicant will need to provide a narrative (with data if available) on success rates for the population comparable to the current population of the Choice Neighborhoods target development. For example, if the proposed Choice Neighborhoods development has 10% of its households as families with 5 or more people, 40% as families with 2 to 4 people, 30% non-elderly disabled, and 20% elderly, the applicant would need to discuss relative success rates for each of these groups in their one-for-one exception application.

Included in this posting is a list of counties (alphabetically) that have public or assisted housing units in Choice Eligible Census Tracts and that meet requirements (1) and (2) noted above. Potential applicants for Choice Neighborhood developments in the counties listed in this posting that would like to replace up to 50 percent of the public housing and/or assisted housing dwelling units to be demolished/disposed of with tenant-based vouchers, must submit their request for this exception to HUD for approval.

The request must include:

- a. A cover letter including a subject line of, "One-for-One Exception Request," and a description of the request;
- b. Data showing a voucher success rate of 80 percent or higher; and
- c. A chart that indicates the number of each type of unit to be demolished or disposed of, as well as the number of each type of unit that will replace it.

The request must be sent via overnight delivery to:

Todd Richardson
Associate Deputy Assistant Secretary for Policy Development
U.S. Department of Housing and Urban Development
451 7th Street, S.W., Room 8106
Washington, DC 20410

If possible, indicate on the package, "One-for-One Exception Request."

HUD will review the request and respond in five working days from its receipt by HUD. That response will be exception approval, exception disapproval, or request for more information. If more information is requested, HUD will respond in five working days upon receipt of the additional information. Potential applicants will be able to appeal HUD's determination.

HUD Analysis

As noted in the Choice Neighborhoods Pre-Notice, only neighborhoods with a poverty or Extremely Low-Income (ELI) rate of 20 percent or higher containing a public or assisted housing development will be eligible to apply for Choice neighborhoods. In addition to a neighborhood meeting this minimum requirement for poverty/ELI rate to qualify for Choice Neighborhoods, the applicants will also need to demonstrate that a property is severely distressed. The table below shows all public and assisted housing units by the poverty/ELI rate of the Census Tract those units are located. It does not show the number of units that are also severely distressed.

Multifamily and Public Housing Units by Census Tract Poverty Rate and Eligibility on Two of Three Exception Requirements

Percent of Poverty/ELI in Tracts	Total Units			Meets Two of Three Exception Requirements			%
	<i>MF</i>	<i>PH</i>	Total	<i>MF</i>	<i>PH</i>	Total	
<i>All Tracts</i>	1,407,593	1,203,159	2,610,752	301,681	252,769	554,450	21%
<i>0-20%</i>	642,175	318,634	960,809	139,633	74,158	213,791	22%
<i>20-30%</i>	299,939	247,516	547,455	55,212	42,131	97,343	18%
<i>30-40%</i>	199,837	211,775	411,612	43,665	44,575	88,240	21%
<i>40% +</i>	265,642	425,234	690,876	63,171	91,905	155,076	22%
<i>Total 20% + (Choice Neighborhoods Eligible)</i>	765,418	884,525	1,649,943	162,048	178,611	340,659	21%

In total, approximately 765,418 Multifamily housing units and 884,525 Public Housing units meet the 20 percent or greater poverty/ELI rate minimum requirement for Choice. Of these, approximately 21 percent are in counties that meet the first two criteria for the one-for-one replacement exception.

Based on prior research on Housing Choice Voucher success rates, HUD estimates that only half of the units that meet the first two one-for-one exception requirements will also be in an area served by a voucher agency with a voucher success rate of 80 percent or higher.

COUNTY	Choice Eligible Units <i>In tracts with 20% + Poverty/ELI</i>			Exception Eligibility			
	Multifamily	Public Housing	Total	Meets Vacancy AND Poverty Metrics?	2000 Vacancy Rate	2005/2007 Vacancy Rate	Voucher Neighborhood Median Poverty Rate in CBSA (or non-CBSA county)
Adams NE	250	0	250	Yes	9.2%	11.9%	14.6%
Adams WA	52	55	107	Yes	11.1%	*	**
Alamance NC	181	220	401	Yes	9.2%	11.1%	13.4%
Alcorn MS	18	630	648	Yes	12.5%	14.6%	13.5%
Allegheny PA	6,609	6,447	13,056	Yes	9.4%	11.6%	16.6%
Allen IN	592	241	833	Yes	11.2%	12.1%	15.5%
Anderson SC	300	276	576	Yes	11.7%	9.9%	16.3%
Anson NC	65	100	165	Yes	7.8%	18.3%	13.0%
Aransas TX	50	0	50	Yes	14.4%	24.8%	19.8%
Atlantic NJ	1,910	1,364	3,274	Yes	8.7%	9.7%	15.3%
Baldwin AL	0	63	63	Yes	17.9%	17.0%	9.9%
Baltimore city MD	7,844	11,953	19,797	Yes	7.8%	10.5%	11.9%
Bartholomew IN	0	32	32	Yes	8.6%	12.7%	6.8%
Bay FL	568	579	1,147	Yes	18.2%	14.7%	19.9%
Bay MI	487	474	961	Yes	7.3%	9.3%	11.1%
Beaufort SC	0	51	51	Yes	13.0%	14.8%	10.7%
Beckham OK	115	0	115	Yes	21.2%	*	15.4%
Bell TX	260	533	793	Yes	9.7%	16.3%	12.3%
Benton WA	173	189	362	Yes	9.2%	14.1%	13.3%
Blount AL	0	102	102	Yes	11.8%	14.5%	18.7%
Boyd KY	633	377	1,010	Yes	12.8%	11.4%	18.0%
Bradford FL	106	0	106	Yes	12.3%	10.6%	14.4%
Brazoria TX	77	0	77	Yes	12.7%	10.8%	17.7%
Brevard FL	991	940	1,931	Yes	10.9%	15.8%	14.7%
Bristol city VA	363	426	789	Yes	13.0%	*	14.0%
Burke GA	143	309	452	Yes	10.5%	12.4%	18.1%
Butler OH	554	934	1,488	Yes	7.6%	12.2%	13.9%
Calhoun MI	184	346	530	Yes	12.1%	11.6%	15.2%
Cape May NJ	109	170	279	Yes	19.7%	12.5%	10.9%
Carter KY	46	38	84	Yes	7.6%	11.4%	18.6%
Carter OK	46	0	46	Yes	14.6%	12.5%	15.4%
Charles Mix SD	12	24	36	Yes	9.1%	*	8.8%
Charlton GA	0	50	50	Yes	14.6%	*	**

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	Multifamily	Public Housing	Total	Meets Vacancy AND Poverty Metrics?	2000 Vacancy Rate	2005/2007 Vacancy Rate	Voucher Neighborhood Median Poverty Rate in CBSA (or non-CBSA county)
Chester TN	195	0	195	Yes	12.2%	*	17.1%
Chesterfield SC	52	182	234	Yes	13.2%	18.7%	16.7%
Christian KY	162	454	616	Yes	7.4%	9.3%	14.2%
Cibola NM	184	9	193	Yes	11.6%	12.7%	14.7%
Clark AR	180	97	277	Yes	9.0%	9.9%	19.7%
Clark IN	238	138	376	Yes	8.2%	9.4%	18.2%
Clark NV	1,551	1,465	3,016	Yes	10.6%	10.6%	10.6%
Clay AR	39	79	118	Yes	12.9%	*	13.4%
Clay TN	0	34	34	Yes	10.7%	*	15.5%
Cleveland NC	177	241	418	Yes	10.7%	13.1%	14.2%
Coffee TN	300	57	357	Yes	9.3%	11.5%	12.8%
Colbert AL	0	252	252	Yes	11.1%	9.4%	17.8%
Collier FL	209	0	209	Yes	7.6%	10.6%	10.3%
Columbia FL	13	7	20	Yes	14.1%	9.2%	10.8%
Comanche OK	182	299	481	Yes	14.0%	10.3%	19.8%
Cook GA	5	18	23	Yes	12.7%	*	17.0%
Coosa AL	0	1	1	Yes	9.1%	*	17.8%
Covington AL	136	286	422	Yes	16.8%	10.8%	16.4%
Craighead AR	355	146	501	Yes	10.0%	12.3%	17.9%
Crawford PA	32	202	234	Yes	8.1%	10.6%	17.6%
Crenshaw AL	0	186	186	Yes	11.8%	*	18.1%
Crockett TN	0	20	20	Yes	8.6%	*	17.5%
Cumberland NC	443	771	1,214	Yes	11.9%	9.9%	13.7%
Cuyahoga OH	9,838	9,241	19,079	Yes	9.6%	10.5%	17.1%
Dale AL	0	360	360	Yes	15.3%	12.4%	16.8%
Dallas MO	28	0	28	Yes	15.2%	*	14.5%
Dauphin PA	729	1,575	2,304	Yes	9.4%	9.2%	9.9%
Daviess KY	275	305	580	Yes	8.3%	10.2%	13.6%
Decatur IA	0	12	12	Yes	10.5%	*	15.2%
Deer Lodge MT	68	49	117	Yes	16.6%	*	11.6%
Delaware IN	264	523	787	Yes	9.1%	11.0%	17.2%
Dewey SD	8	0	8	Yes	11.0%	*	**
Dickey ND	63	0	63	Yes	17.0%	*	11.1%
Dillingham Census Area AK	5	0	5	Yes	8.8%	*	**
Dodge GA	56	0	56	Yes	11.4%	10.0%	17.3%
Douglas NE	623	1,957	2,580	Yes	8.1%	9.8%	13.8%
Drew AR	18	0	18	Yes	10.1%	*	18.7%
Duval FL	3,341	1,648	4,989	Yes	9.7%	10.9%	15.5%

COUNTY	Choice Eligible Units			Exception Eligibility			
	Multifamily	Public Housing	Total	Meets Vacancy AND Poverty Metrics?	2000 Vacancy Rate	2005/2007 Vacancy Rate	Voucher Neighborhood Median Poverty Rate in CBSA (or non-CBSA county)
Dyer TN	0	212	212	Yes	10.7%	11.4%	19.5%
Eastland TX	0	87	87	Yes	11.6%	*	14.9%
Emmons ND	30	15	45	Yes	11.5%	*	16.6%
Fayette AL	18	60	78	Yes	11.1%	*	16.9%
Fayette KY	1,242	789	2,031	Yes	8.2%	9.9%	14.1%
Floyd IN	114	970	1,084	Yes	7.7%	12.2%	18.2%
Forsyth NC	954	1,528	2,482	Yes	10.2%	15.3%	17.2%
Franklin OH	5,590	2,734	8,324	Yes	8.5%	15.0%	12.8%
Franklin WA	126	280	406	Yes	7.5%	10.3%	13.3%
Fulton GA	5,314	7,644	12,958	Yes	7.6%	16.9%	12.5%
Gaines TX	0	63	63	Yes	14.9%	*	**
Gallatin IL	14	59	73	Yes	12.6%	*	**
Gallia OH	0	44	44	Yes	8.4%	13.9%	17.6%
Galveston TX	314	1,097	1,411	Yes	13.7%	12.5%	17.7%
Gaston NC	171	398	569	Yes	7.9%	10.4%	13.0%
Geary KS	100	36	136	Yes	13.3%	15.9%	10.6%
Grant IN	57	52	109	Yes	9.6%	13.2%	17.0%
Grant ND	22	0	22	Yes	13.8%	*	19.9%
Grant NM	0	102	102	Yes	15.2%	11.7%	18.1%
Grayson TX	0	330	330	Yes	8.2%	11.4%	10.9%
Greenbrier WV	8	0	8	Yes	9.9%	9.5%	18.3%
Greenville SC	1,032	644	1,676	Yes	10.9%	10.5%	16.8%
Greenwood SC	297	156	453	Yes	8.1%	9.4%	12.5%
Gregory SD	28	0	28	Yes	14.0%	*	**
Guilford NC	895	2,000	2,895	Yes	7.4%	12.5%	14.8%
Hamilton OH	6,679	4,954	11,633	Yes	9.1%	14.8%	13.9%
Hamilton TN	913	2,653	3,566	Yes	9.0%	11.6%	19.1%
Hardin KY	127	53	180	Yes	9.4%	14.8%	8.6%
Harris TX	7,044	4,273	11,317	Yes	9.0%	14.3%	17.7%
Harrison MS	773	421	1,194	Yes	10.3%	9.3%	16.3%
Henry AL	35	40	75	Yes	9.7%	*	17.4%
Hernando FL	0	36	36	Yes	7.6%	12.1%	16.8%
Hillsborough FL	2,626	3,419	6,045	Yes	9.4%	9.3%	16.8%
Hopewell city VA	0	393	393	Yes	7.5%	14.3%	13.0%
Hopkins KY	176	323	499	Yes	9.8%	10.1%	19.0%

COUNTY	Choice Eligible Units			Exception Eligibility			
	<i>In tracts with 20% + Poverty/ELI</i>			Meets Vacancy AND Poverty Metrics?	2000 Vacancy Rate	2005/2007 Vacancy Rate	Voucher Neighborhood Median Poverty Rate in CBSA (or non-CBSA county)
Multifamily	Public Housing	Total					
Horry SC	160	245	405	Yes	24.5%	19.1%	13.5%
Houston AL	120	669	789	Yes	12.0%	13.5%	17.4%
Houston TN	0	59	59	Yes	11.6%	*	19.1%
Howard IN	0	417	417	Yes	8.8%	10.2%	13.9%
Hunt TX	0	210	210	Yes	9.7%	13.8%	13.7%
Iredell NC	80	368	448	Yes	9.4%	10.8%	9.4%
Issaquena MS	20	0	20	Yes	9.2%	*	**
Jackson AR	10	145	155	Yes	15.5%	*	19.0%
Jackson MO	4,380	1,819	6,199	Yes	9.0%	14.6%	10.7%
Jefferson AL	2,469	7,004	9,473	Yes	10.8%	9.5%	18.7%
Jefferson KY	3,719	4,649	8,368	Yes	7.7%	10.2%	18.2%
Jefferson OK	0	109	109	Yes	15.8%		
Johnson AR	0	88	88	Yes	8.7%	9.9%	16.9%
Johnson MO	120	0	120	Yes	8.5%	9.9%	15.7%
Jones NC	30	0	30	Yes	15.5%	*	18.5%
Jones TX	0	60	60	Yes	13.3%	*	19.8%
Kenton KY	350	903	1,253	Yes	8.0%	13.2%	13.9%
Kinney TX	0	46	46	Yes	11.9%	*	**
Kiowa OK	0	103	103	Yes	19.8%	*	19.8%
Knox NE	0	18	18	Yes	9.2%	*	16.1%
Knox TX	0	75	75	Yes	9.8%	*	**
La Salle Parish LA	0	50	50	Yes	9.2%	*	**
Lafayette MS	123	212	335	Yes	11.0%	9.6%	17.6%
Lake FL	161	0	161	Yes	11.8%	10.6%	13.1%
Lancaster SC	231	40	271	Yes	11.9%	11.3%	15.1%
Lauderdale AL	284	647	931	Yes	11.9%	9.3%	17.8%
Lauderdale TN	96	99	195	Yes	8.4%	18.6%	19.3%
Lee FL	716	638	1,354	Yes	13.9%	18.1%	8.2%
Lee IA	46	146	192	Yes	9.8%	11.3%	13.7%
Liberty MT	30	0	30	Yes	10.6%	*	**
Lincoln MT	20	0	20	Yes	12.4%	*	17.2%
Lincoln NM	0	16	16	Yes	14.1%	23.2%	12.2%
Lincoln TN	53	248	301	Yes	8.7%	15.0%	18.5%
Live Oak TX	24	0	24	Yes	16.2%	*	18.3%
Livingston MO	34	38	72	Yes	11.0%	*	11.6%
Madison AL	702	1,620	2,322	Yes	12.9%	9.3%	15.8%
Madison TN	259	765	1,024	Yes	10.6%	15.5%	17.1%
Manatee FL	330	446	776	Yes	9.6%	12.3%	13.3%
Maricopa AZ	3,822	3,287	7,109	Yes	8.8%	10.2%	13.8%

COUNTY	Choice Eligible Units			Exception Eligibility			
	<i>In tracts with 20% + Poverty/ELI</i>			Meets Vacancy AND Poverty Metrics?	2000 Vacancy Rate	2005/2007 Vacancy Rate	Voucher Neighborhood Median Poverty Rate in CBSA (or non-CBSA county)
Multifamily	Public Housing	Total					
Marion FL	639	50	689	Yes	9.7%	12.3%	15.1%
Marion IN	2,963	1,735	4,698	Yes	11.3%	12.1%	12.1%
Marquette MI	134	253	387	Yes	8.4%	19.0%	14.0%
Martinsville city VA	99	0	99	Yes	13.3%	*	14.4%
Matagorda TX	179	44	223	Yes	13.1%	15.4%	18.5%
McDonald MO	0	147	147	Yes	8.6%	12.1%	13.6%
McHenry ND	8	0	8	Yes	11.4%	*	14.1%
Mecklenburg NC	877	2,834	3,711	Yes	9.4%	9.8%	13.0%
Menominee WI	20	0	20	Yes	8.7%	*	**
Mitchell TX	16	22	38	Yes	19.7%	*	17.5%
Monroe NY	3,375	2,323	5,698	Yes	7.8%	13.0%	16.1%
Montgomery OH	2,757	2,556	5,313	Yes	9.9%	9.6%	13.2%
Montgomery TX	324	0	324	Yes	11.0%	9.7%	17.7%
New Castle DE	1,538	1,514	3,052	Yes	7.7%	11.5%	17.3%
Newberry SC	74	312	386	Yes	10.0%	10.5%	16.9%
Nicholas WV	33	0	33	Yes	7.9%	10.4%	14.1%
Nodaway MO	90	128	218	Yes	8.0%	17.6%	9.8%
Nome Census Area AK	0	34	34	Yes	11.6%	*	**
Nueces TX	1,356	1,825	3,181	Yes	10.6%	12.2%	19.8%
Ohio WV	205	359	564	Yes	13.2%	9.3%	18.5%
Okmulgee OK	158	50	208	Yes	11.3%	11.8%	15.2%
Orange NC	88	151	239	Yes	7.9%	11.8%	14.1%
Osceola FL	135	0	135	Yes	11.3%	13.1%	13.1%
Pasco FL	0	37	37	Yes	11.0%	9.3%	16.8%
Peoria IL	876	770	1,646	Yes	9.5%	12.7%	19.8%
Petersburg city VA	676	474	1,150	Yes	11.6%	14.3%	13.0%
Pettis MO	0	141	141	Yes	8.7%	14.9%	13.8%
Philadelphia PA	10,524	15,996	26,520	Yes	7.4%	10.5%	17.3%
Pickens SC	120	52	172	Yes	13.1%	10.2%	16.8%
Pinellas FL	1,375	915	2,290	Yes	10.3%	9.8%	16.8%
Polk GA	0	264	264	Yes	7.8%	10.9%	14.3%
Pondera MT	8	0	8	Yes	12.9%		11.8%
Pottawattamie IA	70	210	280	Yes	8.8%	9.3%	13.8%

COUNTY	Choice Eligible Units			Exception Eligibility			
	Multifamily	Public Housing	Total	Meets Vacancy AND Poverty Metrics?	2000 Vacancy Rate	2005/2007 Vacancy Rate	Voucher Neighborhood Median Poverty Rate in CBSA (or non-CBSA county)
	<i>In tracts with 20% + Poverty/ELI</i>						
Prentiss MS	30	44	74	Yes	9.6%	10.6%	16.7%
Prowers CO	0	16	16	Yes	13.0%	*	16.7%
Puerto Rico County	42	0	42	Yes	10.3%	*	**
Pulaski AR	1,143	2,218	3,361	Yes	10.2%	12.5%	13.9%
Pushmataha OK	46	123	169	Yes	9.1%	*	**
Quay NM	0	77	77	Yes	18.5%	*	19.4%
Ramsey ND	38	47	85	Yes	12.6%	*	16.2%
Reeves TX	0	152	152	Yes	14.8%	*	**
Richland IL	17	9	26	Yes	14.6%	*	13.3%
Richland SC	1,693	1,532	3,225	Yes	8.8%	10.3%	15.7%
Richmond GA	1,077	2,396	3,473	Yes	11.7%	9.4%	18.1%
Rio Grande CO	52	0	52	Yes	9.1%	*	13.8%
Rock WI	392	52	444	Yes	7.7%	10.2%	10.2%
Rockingham NC	104	0	104	Yes	8.6%	9.9%	14.8%
Runnels TX	0	68	68	Yes	12.2%	*	**
San Patricio TX	189	244	433	Yes	10.3%	10.2%	19.8%
Santa Rosa FL	50	87	137	Yes	14.7%	10.7%	19.5%
Scotland NC	56	332	388	Yes	7.6%	9.8%	19.0%
Sedgwick KS	288	339	627	Yes	11.7%	9.9%	14.6%
Seminole FL	198	476	674	Yes	7.5%	10.6%	13.1%
Sharp AR	22	0	22	Yes	10.9%	*	15.6%
Sierra NM	115	85	200	Yes	17.6%	*	19.0%
Spalding GA	444	145	589	Yes	8.3%	9.6%	12.5%
Spartanburg SC	654	900	1,554	Yes	11.4%	10.4%	12.8%
St. Johns FL	167	0	167	Yes	8.5%	9.4%	15.5%
St. Joseph IN	668	577	1,245	Yes	7.4%	12.0%	14.8%
St. Lawrence NY	201	291	492	Yes	7.8%	9.6%	19.7%
St. Louis city MO	5,677	3,311	8,988	Yes	11.9%	10.6%	17.2%
St. Lucie FL	167	821	988	Yes	12.4%	14.0%	13.8%
Stephens TX	70	25	95	Yes	18.1%		16.1%
Stephenson IL	0	250	250	Yes	11.8%	13.9%	11.0%
Stone MS	0	16	16	Yes	10.9%	*	16.3%
Summit OH	2,329	3,590	5,919	Yes	8.3%	10.1%	16.4%
Taos NM	0	49	49	Yes	19.3%	13.1%	18.7%
Tarrant TX	1,880	1,435	3,315	Yes	8.1%	13.6%	13.7%
Taylor WV	64	205	269	Yes	10.5%	*	17.4%
Tazewell VA	15	0	15	Yes	11.7%	9.7%	18.4%
Tishomingo MS	48	110	158	Yes	12.8%	*	13.8%

COUNTY	Choice Eligible Units <i>In tracts with 20% + Poverty/ELI</i>			Exception Eligibility			
	Multifamily	Public Housing	Total	Meets Vacancy AND Poverty Metrics?	2000 Vacancy Rate	2005/2007 Vacancy Rate	Voucher Neighborhood Median Poverty Rate in CBSA (or non-CBSA county)
Todd KY	0	100	100	Yes	10.0%	*	19.0%
Tom Green TX	280	81	361	Yes	12.9%	9.5%	15.2%
Tulsa OK	2,389	2,278	4,667	Yes	8.9%	10.3%	15.2%
Vanderburgh IN	242	864	1,106	Yes	8.5%	11.2%	16.0%
Vernon Parish LA	30	157	187	Yes	8.5%	13.3%	18.5%
Vigo IN	160	375	535	Yes	11.3%	10.7%	18.9%
Volusia FL	868	916	1,784	Yes	7.9%	11.6%	13.0%
Walker GA	90	300	390	Yes	9.2%	11.0%	19.1%
Ward TX	0	30	30	Yes	19.3%	*	13.9%
Washington MO	46	116	162	Yes	7.7%	12.0%	17.2%
Washington OK	156	0	156	Yes	7.7%	13.8%	13.4%
Washington PA	351	526	877	Yes	9.8%	10.5%	16.6%
Wayne IN	125	154	279	Yes	9.1%	13.3%	13.8%
Wayne MI	12,888	6,801	19,689	Yes	7.5%	10.4%	14.2%
Wayne NC	296	1,063	1,359	Yes	7.5%	12.4%	17.7%
Weber UT	604	64	668	Yes	9.7%	9.9%	9.9%
Wetzel WV	205	0	205	Yes	9.8%	*	16.3%
Wichita TX	344	687	1,031	Yes	12.3%	13.7%	11.7%
Winnebago IL	622	1,684	2,306	Yes	8.1%	9.8%	13.9%
Yalobusha MS	32	200	232	Yes	8.6%	*	19.3%
Yuma AZ	72	356	428	Yes	14.4%	11.1%	11.4%

* 2005/2007 Vacancy Data from American Community Survey Not Available, 2000 Vacancy Rate Used for Analysis

**CBSA or non-CBSA county has no Housing Choice Vouchers in Use