



**Stewards of Affordable Housing for the Future  
Landscape Analysis  
February 23, 2023**

**Background**

Racial equity is a core value for Stewards of Affordable Housing for the Future (SAHF) and its members. To operationalize the commitment to racial equity, SAHF and its members created a racial equity pledge with six areas of focus: Board and Leadership Commitment and Transparency; People andC; Real Estate, Investment and Partnerships; Contracting and Spending; and Resident Experience. As SAHF begins implementation of activities aligned with the pledge, SAHF partnered with CURE to produce a landscape analysis on racial equity initiatives and frameworks in the affordable housing sector.

Prior to conducting the landscape analysis, CURE completed several preliminary tasks. CURE conducted a kick-off call with senior staff from SAHF to ascertain additional information regarding SAHF's mission and programs, the development of the racial equity pledge and areas of focus for the landscape analysis. SAHF indicated that the scan should focus on two areas of the racial equity pledge: Real Estate, Investment and Partnerships and Policy. Following the kick-off meeting, SAHF staff provided CURE with several background documents that could inform the analysis. A few weeks later, CURE submitted preliminary findings to SAHF and held a call to solicit feedback. SAHF leadership expressed that the primary focus of the scan should be to provide information regarding racial equity frameworks and strategies that can be applied to their work and provided information on specific organizations that should be reviewed to ascertain their racial equity strategies and investments in affordable housing.

**Methodology**

CURE conducted an internet scan of organizations that:

- Apply a racial equity framework or strategy in affordable housing or utilizes an analysis that could be applicable to SAHF's mission and agenda
- Provide financial and technical assistance to new and established BIPOC real estate professionals
- Analyze the Community Reinvestment Act (CRA) to recommend changes to make the CRA more responsive to the needs of communities of color
- Operate a renter wealth creation program; and
- Articulate a national racial equity strategy for community development.

In total, CURE reviewed over 25 organizations as part of the scan. The scan is organized in two areas: 1) policy and 2) real estate, investment and partnerships. Due to SAHF's preference for information on racial equity frameworks that could be applied to their work, the policy section is the first section of the scan. The real estate section is divided into wealth creation, BIPOC

developers and investor partnerships. The appendix includes additional racial equity rubrics that are applicable to any issue area and also features a table outlining several current initiatives aimed at assisting BIPOC real estate developers.

### General Findings & Observations

- Many of the racial equity frameworks that address issues in the housing arena use the term “housing justice” to describe their efforts. The housing justice framework includes a range of guiding principles and demands including:
  - The view that housing is a human right
  - Reparations are needed to address the history of indigenous land-theft and anti-Black federal housing policy.<sup>1</sup>
  - Housing policy should guarantee availability and access to affordable, health and safe housing options
  - Renter protections including enforcement of tenant rights, expanding eviction notice periods, banning eviction discrimination to creating true affordable housing<sup>2</sup>
  - Promotion of wealth-building by confronting historical and ongoing harms and disparities caused by structural racism.<sup>3</sup>
  - Housing policy must center the experiences and priorities of those directly impacted by housing inequities<sup>4</sup>
  - Inclusionary zoning measures and policies to prevent gentrification and displacement of communities of color and low-income residents
- Most of the racial equity frameworks that were found are qualitative in nature and tend to focus on systems and policy change.
- The frameworks that were found were wide ranging in terms of content and areas of focus. However, a few similarities were found. The goal of most of these racial equity strategies is to improve access to existing housing options and systems through changes in organizational practices and relationships with communities of color, recognizing that the needs of BIPOC (Black, Indigenous and People of Color) residents are not the same as white residents. These strategies don’t completely shift power to the residents, but empower organizations that serve BIPOC residents to view their actions in a different light (e.g. Will this program be beneficial? Will this program benefit everyone or just a few?)
- Currently, there are few innovative initiatives in the wealth creation space. There are organizations who are doing this work in Ohio and in California. Many of the resident wealth creation opportunities that were found are in the area of commercial property.

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<sup>1</sup> See pg. 17 of the Center for Community Change Housing Justice [Platform](#) for information regarding a proposed reparations based advocacy platform.

<sup>2</sup> [Local Power & Justice Housing Policy Toolkit](#), Local Progress

<sup>3</sup> [Urban Institute Housing Justice Hub](#)

<sup>4</sup> Two of CURE’s racial equity [principles](#) are Movement Solidarity and Shift Power. CURE considers strategies and policy solutions from a variety of organizations, including grassroots, community-based organizations and people directly impacted by the issues that CURE is trying to change.

- Many banks and housing organizations have rolled out initiatives dedicated to providing technical assistance, capital and support to BIPOC developers. These initiatives are still in the early stages and their impact is unknown at this time.
- Several national lending institutions lack a clear, well-articulated position on racial equity, particularly as it pertains to affordable housing initiatives. Most of these organizations simply list the activities that they view as integral to their racial equity strategy, rather than present a clear, overarching vision of their equity work.
- Organizations that operate in the technology sector also lack a well defined vision for racial equity in affordable housing. The philanthropic arm of major technology companies attempt to address housing concerns by including housing in other strategies, specifically community strategies, or addressing this issue through projects in specific geographic locations, rather than an organization-wide approach to these issues.

## Landscape Analysis Findings

### I. Policy

A. Racial Equity Frameworks: This section provides a table with an overview of each framework, description of the frameworks' components, policy and system change details and what evaluation techniques and metrics the framework utilizes.

| <u>Organization</u>                                    | <u>Framework Overview</u>   | <u>Framework Components</u>   | <u>Policy &amp; System Change Details</u>  | <u>Evaluation &amp; Metrics</u>  |
|--|---|---|--|--|
| <a href="#">Center on Budget and Policy Priorities</a> | This framework is comprised of nine policy areas that seek to address the urgency of preserving public housing. | 9 Policy areas:<br>1)upfront renovation funding; 2) ongoing public housing funding; 3) improved Section 8 conversion option; 4) ensuring policies work for small housing agencies; 5) investment in public housing neighborhoods; 6) expanding housing choices; 7) using replacement housing units to address historical inequities; 8) improved resident services; and 9) fairer access to public housing. | In terms of racial equity, the applicable sections of the framework call for increased investment in public housing neighborhoods, increased choice for public housing residents through improved implementation of the HUD RAD (Rental Assistance Demonstration) choice-mobility option, replacing public housing that was eliminated in the past by allowing new replacement units to receive long-term Section 8 funding, providing resident support services, and improving access | The framework calls for an evaluation of the impact of the Choice Neighborhoods Initiative revitalization grants for distressed neighborhoods. Specific metrics that would be used to conduct the evaluation were not mentioned. |

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|--|---|--|---|---|
|  |   |  | to housing for those with substance abuse or who have been impacted by the criminal-legal system.   |   |
| <a href="#">Center for Supportive Housing</a>          | This framework is primarily geared toward CSH’s workforce and outlines steps to build an anti-racist culture. | The components of the framework include culture, workforce, fund development, consulting and technical assistance, policy and systems change, and training and education. At the center of this framework is the development of shared values that acknowledge the individual and systemic impact of racism. | In terms of policy and systems change, this will be accomplished by creating and implementing a strategic policy approach that addresses institutional barriers across agencies and systems through: 1) development, training and implementation of an equity process based on the Racial Equity Assessment and 2) maintenance of a dynamic policy agenda that is regularly reviewed for inclusivity. | CSH created a Racial Equity Impact Assessment tool. This tool has three foci: 1) People (bringing those most impacted to the decision making process); 2) Data (using data to produce change); and 3) Accountability (having community relationships to ensure equitable and sustainable practices and change efforts). |
| <a href="#">DC Housing Equity Framework for Growth</a> | This framework is a partnership between several agencies, the DC Office of the Deputy Mayor                   | At the center of this framework is housing production, which is supported by additional  | The framework will examine policies and opportunities to create a fairer, more inclusive  | The Office of Planning and the DC Housing Finance Agency will establish policies and  |

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|---|---|---|---|--|
|   | for Planning and Economic Development, the DC Department of Consumer and Regulatory Affairs, DC Department of Human Services, and DC Housing Finance Agency. This analysis is intended to inform how DC produces more affordable market rate housing while advancing more equitable distribution goals. | elements including market forces, community dynamics, and public policy services and regulation.  | supply of affordable housing.   | metrics to evaluate progress. <sup>5</sup> |
| <a href="#">Enterprise Community Partners</a> | This framework utilizes a holistic approach for community development through the use of a healing-centered project screen to provide prompts and questions to apply a healing-   | The framework has principles and strategies. The principles require respondents to reflect upon their experiences in their communities. The prompts are : 1) what we protect; 2) what we value; | This framework seeks to change the way that people build relationships with each other. This framework provides guidance on how to be in the right relationships with ourselves, each | N/A  |

<sup>5</sup>The DC Office of Planning conducted a 2021 [presentation](#) addressing racial equity comprehensive plan implementation. Housing is an element of this plan. Relatedly, CURE provided training to the DC Office of Planning and provided strategic review of three small area neighborhood plans as part of the agency’s efforts to align its development plans with the city’s [Council of Racial Equity](#) (CORE) racial equity impact assessment guidelines.

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|  | centered lens to community development.   | 3) how we do our work: 4) how we measure our work; and 5) what our end goal is. The strategies are the application of the principles: These include: reflect (build self-awareness), involve (honor inherent strengths); restore (create spaces for healing); invest (create community power) and reimagine (advance liberation). | other, and with land. This framework recognizes that healing is required to deal with the impacts of racial oppression in order to produce transformative change.                       |  |
| <a href="#">Grounded Solutions Network</a> | GSN produced two reports on advancing racial equity, in inclusionary housing and housing and community development. | The inclusionary housing report offers 14 recommendations for prioritizing racial equity in housing programs, taking into account the needs and preferences of communities of color and the need for race and ethnic data collection to   | Relevant takeaways include: race conscious strategies are necessary to mitigate racist barriers and impactful policy is best designed in collaboration with those who will be impacted. | The framework notes the importance of evaluating and tracking internal hiring, promotion, and retention practices to include intentional strategies to advance racial equity. Also, creating an internal organizational racial equity plan |

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|   |   | <p>inform policy decisions. Some of these recommendations include choosing income targets for affordable units, requiring lasting affordability for affordable units, considering the use of city subsidies and requiring or encouraging the construction of unit sizes that match the household size of renter households of color. The report on housing and community development outlines four areas that foster racism and provides anti-racist interventions at each level</p> |  | <p>with accountability metrics.</p>  |
| <p><a href="#">Housing Development Consortium</a></p> | <p>HDC produced a racial equity toolkit that aids organizations in applying a racial equity lens to</p> | <p>The toolkit is grounded in four principles, racial equity education, identification of organizational</p>   | <p>The toolkit provides resources that organizations can use once they have identified</p> | <p>The Racial Equity Impact Tool has six steps: set outcomes; involve those impacted and analyze data;</p> |



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|  | their work and can be customized to meet specific organizational needs.                     | equity issues, creation of a plan for change and implementation.  | areas of improvement which includes an organizational plan for racial equity.   | determine benefit and/or burden; advance opportunity or minimize harm; accountability and raise awareness; and report back.  |
| <a href="#">Milwaukee's Collective Affordable Housing Strategic Plan</a> | The primary objective of this report is to increase BIPOC homeownership rates in Milwaukee. | This plan utilizes the Government Alliance on Race & Equity Toolkit. The plan is guided by four objectives: 1) systems to increase Black and Latino homeownership, 2) systems to preserve Black & Latino homeownership, 3) systems to increase affordability of housing for families making \$7.25-\$15 per hour and 4) systems to preserve affordable housing for families making \$7.25-\$15 per hour. <sup>6</sup> | This plan seeks to produce policy and systems change by laying the foundation for achieving racial equity in homeownership and to provide quality affordable housing for every family making \$7.25 to \$15 per hour. | The objectives will be evaluated yearly based on key performance indicators. These metrics include homeownership rates by race, anti displacement indicators, number of low-income households that are rent burdened, and number of evictions. |

<sup>6</sup> With regard to the 3rd and 4th objectives: 3rd objective: One aim is to create an acquisition fund for affordable rental homes and to provide a pathway for residents and landlords to provide rental homes

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| <a href="#">National League of Cities</a>                           | NLC produced an article on strategies to embed racial equity in housing.  | The recommendations include conducting a racial impact study, funding equitable development, supporting and funding shared equity ownership models and implementing inclusionary housing programs. <sup>7</sup> | In order to produce systems change, NLC recommends that cities incorporate equitable development principles of transparency, community engagement, and collaborative planning. This will increase access to quality, affordable housing and equitable economic growth. | This article referenced draft New York City legislation that sought to mandate a racial impact study for land use actions. This would include an analysis of direct and indirect residential impacts of proposed actions. |
| <a href="#">National Low Income Housing Coalition Ideas Project</a> | The Inclusion, Diversity, Equity, Anti-Racism, and Systems Thinking (IDEAS) is NLIHC’s organization-wide approach to advance racial equity across | NLIHC is committed to ensuring that its policy positions address racial equity and examine measures to address the needs of marginalized  | Systems change action items include investments in Black-led social change efforts, increased partnerships with Black-led organizations,   | N/A Measurement was not addressed.  |

for \$00-650 per month. 4th objective: The goal is to launch eviction mitigation programs beyond the COVID-19 pandemic. Additional strategies include: increase capacity to monitor expiring rental homes, recruit managers, and create financial structures to facilitate preservation. Develop local regulations to ensure that responsible landlords can compete on a level playing field with irresponsible landlords. Hold problem landlords accountable.

<sup>7</sup>Equitable housing development is defined as strong communities and people and great places with equitable access. Strong communities are viewed as communities with stability and resilience. Places with equitable access are referred to as a city where neighborhoods are safe, healthy, and afford their residents with well being.

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|   | <p>several domains, including policy analysis and strategy, internal operations, and external partnerships. The goal of the project is to create a pathway to a racially and socially equitable society where everyone has a quality, affordable home.</p>                 | <p>people.</p>  | <p>the development of an IDEAS curriculum for staff and partners and expanding existing racial justice conversations. <sup>8</sup></p>   |                                 |
| <p><a href="#">PolicyLink Housing Justice Narrative Toolkit</a></p> | <p>Policy Link produced a housing justice narrative toolkit that was created based on the belief that policy solutions for housing justice are already known, but there is a need for a different way to intensify the narratives that support these policy solutions.</p> | <p>The toolkit contains ways to harness the power of narrative, methods to intensify anti-racist messages, provide opportunities to lead and design housing for the future and ways to create a new narrative based on equity. There are also tools for understanding your audience, digital strategies, and engagement</p> | <p>This resource can propel policy and systems change forward by providing the tools to create a powerful housing justice narrative that is built on seven themes: solidarity, joy, freedom, safety, privacy and protection, stewardship, and restoration.</p> | <p>N/A</p>                      |

<sup>8</sup> For additional resources on systems change, please visit this [link](#).

| <u>Organization</u>                                       | <u>Framework Overview</u>  | <u>Framework Components</u>  | <u>Policy &amp; System Change Details</u>  | <u>Evaluation &amp; Metrics</u>   |
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|   |  | strategies.  |  |   |
| <a href="#">Urban Institute Housing Justice Framework</a> | Urban Institute developed an evidence-informed approach to achieving housing justice. One element of this framework is Urban’s <a href="#">Housing Justice Library</a> . | The framework includes the following principles: housing is a human right; prioritize solutions shaped by those with lived experiences; create policies that repair past harms caused by racist policies; make housing available to all people; build wealth creation opportunities; guarantee resident choice; and foster a sense of belonging. | By aligning policies with the housing justice principles, policymakers can increase access to safe, affordable housing and promote wealth building by confronting disparities caused by structural racism. | While there are no formal evaluation methods and metrics mentioned, the framework was applied to several housing topics including land use zoning, rental subsidies/vouchers , fair tenant screening practices, and reparations to illustrate how the framework can be applied to existing policies and programs. As the project continues, Urban will explore additional policy areas and how these areas can be analyzed using the framework. |

B. Policy Recommendations: This section provides a summary of the [comments](#) filed by the National Community Reinvestment Coalition (NCRC) in August 2022 on Community Reinvestment Act (CRA) Interagency rulemaking. Through these comments, NCRC sought to strengthen the CRA to realize its full potential to increase loans, investments and services in traditionally underserved communities.

NCRC’s comments, if implemented, would prioritize the use of race in lending, call for increased tenants’ rights, and increased transparency in the lending process. Below are NCRC’s calls to action that would advance racial equity:

- Calling on the CRA to explicitly consider bank activity by race and ethnicity in CRA

- exams;
- Elevate the importance of public comments regarding how banks are responding to local needs;
  - Including consideration of community benefit agreements in CRA exams and bank merger reviews and asking that banks and agencies proactively reach out to community organizations and the public;
  - Enhancing community development definitions to more effectively target activities to communities in need;
  - Discontinuing the positive scoring of affordable housing projects that displace marginalized communities;
  - Calling for anti-discrimination and fair housing lending reviews to be more transparent;
  - Requesting that agencies include strong measures to ensure long-term housing affordability;
  - Promoting tenants' rights and fair housing by requiring banks to screen developers and property owners; and
  - Increasing public input mechanisms in CRA exams and merger reviews.

The U.S. Department of Housing and Urban Development (HUD) just announced an updated housing provision, the [Affirmatively Furthering Fair Housing \(AFFH\) provision](#), that will require HUD and certain recipients of public funds to demonstrate how they are using funds to correct housing inequities. This proposed rule would hold cities accountable for addressing housing inequities. In 2015, an AFFH planning framework was established under the Obama Administration, but this rule was repealed by the Trump Administration. HUD has published a Notice of Proposed Rulemaking which allows 60 days for public comment before finalizing this rule. This NPR presents an opportunity for SAFH to present recommendations to strengthen this rule.<sup>9</sup>

## **II. Real Estate Investment and Partnerships**

### **A. Community Land Trusts**

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<sup>9</sup> For additional resources on this proposed rule, please use this [link](#).

| <b><u>Organization</u></b>                                | <b><u>Model Background</u></b>  | <b><u>Policy &amp; System Change Details</u></b>  |
|---|---|---|
| <a href="#"><u>Crescent City Community Land Trust</u></a> | CCCLT provides residents with permanently affordable housing and rental spaces. The CCCLT redeveloped the Vaucresson sausage factory which provided permanent affordable housing to residents of the 7th Ward. This commercial redevelopment project provided entrepreneurs with affordable leases and preserved a small, family owned business. In addition, CCCLT also redeveloped the historic Pythian building in downtown New Orleans which yielded 69 apartments, 25 of which will be permanently affordable. | CCCLT focuses on projects aimed at racial equity in response to the city’s housing crisis, but also advocates for housing advocacy, promotes community stewardship and economic development.  |
| <a href="#"><u>Douglas Community Land Trust</u></a>       | The DCLT is a non-profit membership organization centered around racial equity in Washington, DC. DCLT aims to make DC an equitable place to live where Black and Brown residents can live and thrive.  | DCL prioritizes racial equity by securing housing affordability of rental and ownership housing and through community ownership of land and collective stewardship. DCLT also strives to maintain high-quality, healthy housing, and creates opportunities for resident asset building. |

B. Wealth Creation

The landscape analysis revealed that despite interest from cities in developing occupant equity programs, also known as renter equity, this is an understudied aspect of the housing industry. However, several examples of these programs were found.<sup>10</sup>

| <b><u>Organization</u></b>                               | <b><u>Program Background</u></b>  | <b><u>Policy &amp; System Change Details</u></b>  |
|--|---|---|
| <a href="#"><u>Cornerstone Renter Equity Program</u></a> | This Ohio program, which started in 2002, allows renters to build wealth, develop ownership skills and stabilize their communities. Each month that renters fulfill the | Members can earn “equity” in a variety of areas including housing, their community, financial, health, programs and social networking. Housing equity is earned by on time rental payments. Community equity is |

<sup>10</sup> These are some additional resources related to wealth creation: 1) this [article](#) provides an overview of community shareholding models and 2) this [article](#) provides an overview of renter equity programs.

| <u>Organization</u>                                       | <u>Program Background</u>  | <u>Policy &amp; System Change Details</u>   |
|---|--|---|
|   | <p>requirements of their lease agreement, they earn equity credits toward a “cash payment.” Members can earn up to \$155 monthly or \$2000 each year and are fully vested after three years, which means that they can withdraw equity to purchase a home or vehicle, address other needs, or continue to save.</p>  | <p>earned by attending community meetings, volunteering, and participating in community events. Health equity is earned by attending healthcare appointments and engaging in healthy activities. Social networking equity is earned when residents assist a community member with an identified need. Program equity is earned by completing quarterly and annual self-sufficiency assessments.</p>   |
| <p><a href="#">Nico Echo Park Benefit Corporation</a></p> | <p>This is a neighborhood REIT that operates in the Echo Park section of Los Angeles. The REIT owns rent stabilized, income-producing properties in Echo park that represent \$30 million in total asset value. There are local and nonlocal shareholders. Local shareholders must reside in a ten zip code area surrounding Echo Park and can make a one-time or recurring investment. The minimum investment is \$100.</p> | <p>This REIT’s mission is to localize wealth creation and broaden access to neighborhood equity through long-term investments in local real estate. This program is the world’s <i>first</i> neighborhood REIT. Nico is organized as public benefit corporation and has a <a href="#">social impact framework</a> organized around five areas: 1) increased financial inclusion and wealth creation (increased financial literacy, benefits of investment are distributed across a wider range of residents across incomes); 2) distributed power and stakeholder alignment (direct stakeholder input in management decisions); 3) improved environment and quality of life (building and unit upgrades, environmental health and civic engagement are acknowledged as sources of value and wealth creation); 4) neighborhood diversity and stability (broad range of quality housing options and long-term tenant stability); and 5) strong local economy (new opportunities are created to connect local economic activity to community wealth creation).</p> |
| <p><a href="#">Renting Partnerships</a></p>               | <p>Renting Partnerships is an Ohio organization led by two women who are influential in creating the rental equity program. Residents</p>  | <p>Renting partnerships seeks to advance racial equity by acquiring and rehabilitating housing in existing neighborhoods to combat gentrification. This program</p>   |

| <u>Organization</u> | <u>Program Background</u>  | <u>Policy &amp; System Change Details</u>   |
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|                     | build financial equity through participation in governance and management. Lease agreements require that residents participate in management and each household earns financial credits that can be converted into cash in five years. In order to earn credits, residents must meet four criteria: pay rent on time, attend monthly meetings, fulfill work assignments and respect house rules. In ten years, the maximum that a resident can earn is \$10,000. | provides opportunities for low-income households to stabilize their lives and build wealth through participation in affordable community-owned housing. |

C. Public Funding to Advance Housing Equity

Below are examples of municipalities that have prioritized racial equity in the deployment of public resources to develop or support affordable housing initiatives.

| <u>Organization</u>                                | <u>Framework Overview</u>   | <u>Framework Components</u>  | <u>Policy &amp; System Change Details</u>  | <u>Evaluation &amp; Metrics</u>   |
|--|---|--|--|---|
| <a href="#">Chapel Hill Housing Advisory Board</a> | Board adopted a racial equity lens to its scoring rubric to prioritize funding for organizations that promote racial equity in community development. | Organizations can address racial equity in a number of ways, including staff training, hiring a diverse staff, and having people of color in certain organizational positions. | Housing affordability in Chapel Hill is defined as housing that does not cost more than 30% of household income. | Affordable housing applications are evaluated on a points system with 215 maximum points. Organizations that prioritize racial equity can receive a maximum of 10 points. |



| <u>Organization</u>  | <u>Framework Overview</u>  | <u>Framework Components</u>   | <u>Policy &amp; System Change Details</u>  | <u>Evaluation &amp; Metrics</u>   |
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| <a href="#">Chicago Department of Housing</a>                                      | <p>In 2021, the City implemented a Racial Impact Assessment (REIA) on a Qualified Allocation Plan (QAP) to ensure LIHTCs are addressing the needs of communities of color.</p> | <p>There are eight themes to inform the QAP application: data infrastructure and reporting, ensuring BIPOC developers benefit from LIHTC, incentives for partnerships and wrap-around services, resident choice, improving outcomes and wealth building opportunities, ensuring residents with disabilities and diverse language needs can find and live in LIHTC units and increasing partnership incentives</p> | <p>The QAP determines more than 60% of the City of Chicago’s affordable housing resources. The revised QAP provides unprecedented transparency to guide developers applying for credits based on priority locations, building types and uses, and affordability.</p> | <p>The REIA is the department’s own evaluation of its own tax credits over the past 20 years and a structure for ongoing accountability through a racial equity lens. Racial equity is evaluated through the eight themes that will inform the QAP application.</p> |
| <a href="#">City of Minneapolis Renter Opportunity to Purchase Draft Ordinance</a> | <p>This draft ordinance seeks to promote the preservation of affordable housing, reduce racial disparities, and prevent renter displacement.</p>                               | <p>Promotes the preservation of affordable housing, creates opportunities for homeownership, reduces racial disparities and prevents renter displacement.</p>   | <p>This ordinance supports renters and increased BIPOC homeownership rates. Renters will be able to purchase property from</p>   | <p>N/A</p>  |

| <u>Organization</u>                              | <u>Framework Overview</u>  | <u>Framework Components</u>  | <u>Policy &amp; System Change Details</u>  | <u>Evaluation &amp; Metrics</u> |
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|  |  |  | owners or form cooperatives, assign rights to the City or to Qualified Organizations (QO). BIPOC developers will have the opportunity to become QOs through a City Request for Qualifications Process. |                                 |
| <a href="#">DC Department of Housing Finance</a> | The Department has initiated a program to provide affordable housing tax abatements in high need areas (Rock Creek West, Rock Creek East, Capitol Hill and Upper Northwest). | In order to be qualify, a property must be in an eligible area, 1/3 of the housing units must be affordable and rented by households earning no more than 100% of median family income, developers must file an affordability covenant in land records, developer must enter into a First Source Agreement, and the developer must enter into an | This program preserves housing affordability and organizations that apply for the abatement must have provisions that 1/3 of the units will continue to be affordable during the abatement period.     | N/A                             |

| <u>Organization</u>  | <u>Framework Overview</u>   | <u>Framework Components</u>  | <u>Policy &amp; System Change Details</u>   | <u>Evaluation &amp; Metrics</u>  |
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|  |   | abatement agreement with the Department.   |   |  |
| <a href="#">Michigan State Housing Development Authority</a> | MSHDA introduced a racial equity lens and potential changes to the 2024-25 QAP to advance equity in LIHTC communities.  | The department developed a racial equity assessment <a href="#">survey</a> to understand how these changes may impact different communities The survey will ask stakeholders how the QAP currently impacts their lives and how they would be impacted by the proposed changes.           | Currently, the department is still obtaining survey data, compiling public comments on the proposed changes and conducting stakeholder engagement so there are no system change details available at this time. | N/A  |
| <a href="#">San Francisco Housing Accelerator Fund</a>       | The Fund helps community organizations preserve and build affordable housing. The Fund’s impact crosses racial boundaries and advances racial equity. The fund has a variety of projects, including mixed income housing, living opportunities for those with mental health challenges, housing | This organization’s approach has 4 components: 1) pooling funding from public, private and philanthropic sources; 2) identify high-impact projects and buildings in need of flexible capital; 3) invest funds quickly to propel projects forward; and 4) deliver new units of affordable | The Fund worked with the Turner Center to compile and share <a href="#">lessons</a> learned from their Permanent Supportive Housing Prototype.  | Four factors were identified that led to cost savings: 1) Up front commitment to time and cost savings; 2) flexible, unrestricted funding; 3) streamlined approvals; and 4) modular construction. In terms of evaluation |

| <u>Organization</u> | <u>Framework Overview</u>                     | <u>Framework Components</u>    | <u>Policy &amp; System Change Details</u> | <u>Evaluation &amp; Metrics</u>   |
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|                     | to end homelessness and predevelopment loans. | housing and protect residents. |   | metrics, the four In addition, this organization provided impact <a href="#">data</a> . |

D. Investor Partnerships

Below is a summary of how large, national banks are funding community development projects that address racial equity in affordable housing.

1. [Capital One](#): Capital One has launched the Capital One Impact Initiative, which seeks to address inclusion by closing gaps in equity and opportunity. Affordable housing is one aspect of this initiative. Capital One is financing affordable housing developments that meet the needs of diverse households in partnership with nonprofit organizations, for profit real estate developers and the government. Other elements of this initiative are small business support, workforce development and financial well-being.
2. [JP Morgan Chase](#): In October 2020, JP Morgan announced a four-pronged approach to close the racial wealth gap, with a focus on BIPOC communities. The promotion and expansion of affordable housing and ownership in underserved communities is one of the four goals. The firm seeks to create and preserve 100,000 affordable rental apartments and has approved \$1 billion in lending and new construction of affordable housing. JP Morgan has housing projects in New York City, Chicago and the District of Columbia. In addition, over the next three years, JP Morgan Chase is funding the [Connecting Capital and Community Initiative](#) that will examine the racial inequities that exist in the housing ecosystem in six cities (Chicago, Washington, DC, Los Angeles, Miami, New Orleans, Seattle). In each city, a diverse team of stakeholders will create a project that will change the structure of opportunity in that respective city. These six-city teams will enhance community investment, attract and leverage capital for investment, recognize and remedy the inequities in the housing ecosystem, share experiences with other teams, and work across three capital absorption functions (defining shared priorities, developing a pipeline and capital flow, and changing policies and practices to the change the structure of opportunity and achieve important community goals).

3. [Prudential](#): Prudential has articulated racial equity as a core principle, but the initiatives are focused on the organization's internal operations and no projects related to housing were found.
4. [Wells Fargo](#): Wells Fargo has provided information related to its commitment to advancing racial equity in a variety of areas, in its 2022 DEI report, press releases, and in other areas of their website. In Wells Fargo's [2022 DEI Report](#), the organization articulated several ways in which it seeks to advance racial equity: increasing the supply of affordable housing, expanding BIPOC home ownership opportunities, increasing housing stability and supporting transformation and innovation. As part of its efforts to support transformation and innovation, Wells Fargo partnered with Enterprise Community Partners to address racial equity in community development through the [Housing Affordability Breakthrough Challenge](#), a three-year, \$20 million initiative. Applicants must address three areas: housing construction, finance, and resident services and support. The winners of the funds have utilized the funding to address racial equity through programs addressing trauma-informed care, wealth building, increased capital to Native American communities and linking affordable homes with accessible health care. Wells Fargo also announced that they have commissioned a third-party racial equity [audit](#) to reinforce its commitment to racial equity and to take steps to close the racial wealth gap. In the press release announcing the equity audit, Wells provided additional information related to its efforts to advance racial equity, including an investment in thirteen Black-owned banks and the issuance of a second sustainability bond supporting affordable housing.

#### *Additional Investors*

Below are descriptions of the methods that other investors are utilizing to articulate their strategy regarding investments to advance equity in affordable housing. Amazon and Facebook stated that their decision to enter the housing space is due to a desire to address the disproportionate effect of racism on low-income communities and to preserve home affordability for BIPOC communities, but these technology companies entered this space due to the advocacy efforts of housing justice advocates and community organizers. Amazon's expansion into certain regions has raised concerns about gentrification and increased housing prices. A few months after selecting Long Island City as one of two locations for its second headquarters, Amazon announced that it was pulling out of the deal due to concerns expressed by the community related to the bidding process. State government officials felt that the competitive process was merely a mechanism for Amazon to extract large tax incentives that it may not have otherwise received and concerns were raised about Amazon's labor practices including long work hours, opposition to unions, and low pay.

1. [Amazon](#): Amazon's policy position on housing equity recognizes the disproportionate effect of housing unaffordability on low-income and minority families. Amazon has a stated commitment to support innovative housing initiatives and will leverage their position as a large employer to support their efforts. Additionally, Amazon seeks to support investment in areas where they have a local presence and believe that they can

make a difference. In 2022, [Amazon](#) announced a commitment of \$147 million to create and preserve 1,260 affordable homes, primarily with BIPOC developers. These units will be in six of DC's eight wards and in Maryland and Virginia. This announcement brings Amazon's level of commitment in the Washington area to \$992 million in support of 6,200 affordable homes.

2. [Facebook/Meta](#): In 2021, Facebook announced its first four projects as part of its \$1 billion commitment to housing in the Bay Area for residents with the lowest incomes and who are experiencing homelessness. The first round of funding, which totaled nearly \$40 million as part of Facebook's Community Housing Fund, created 500 low-income homes. This fund represents California's largest private fund dedicated to creating housing for extremely low-income families. Meta recognizes that funding is not enough to solve these issues and stated their commitment to supporting systemic policy changes aimed at incentivizing the construction of homes at all levels, encouraging sustainable development and addressing the impacts of discriminatory housing policies.
3. [Mackenzie Scott/Yield Giving](#): Mackenzie Scott has become a leader in donating to organizations devoted to racial equity but she hasn't publicly stated very much in terms of her stance on racial equity and how this informs her charitable donations. This [article contains](#) a quote describing what drives her funding decisions. On her website, the term "racial equity" wasn't found but the site does indicate that gifts are given to advance opportunities of people in underserved communities.
4. [Microsoft](#): Microsoft's approach to equity is embodied in their approach to "strengthening our communities." In terms of housing, Microsoft is pursuing efforts to increase access to affordable broadband services in Los Angeles. Microsoft's 2021 Racial Equity progress report contains information regarding this effort and their overall racial equity initiative.

## APPENDIX

The appendix contains two sections - a section on additional racial equity frameworks and a table of current initiatives aimed at assisting BIPOC developers. The frameworks can be used to develop policy proposals, evaluate programs, and engage in other activities from a racially equitable standpoint.

### *I. Racial Equity Frameworks*

1. [City of Seattle Racial Equity Toolkit](#)

This six-step toolkit has a clear set of steps and has a feedback loop which encourages the respondent to share what they have learned with organizational leadership. The steps include setting outcomes, determining benefits or burdens, stakeholder engagement, advancing opportunity or minimizing harm, evaluation and sharing the results of the analysis. This toolkit can be used by those with different racial perspectives and is more of a qualitative analysis. It can be used to assess policies, programs, and budget initiatives.

2. [District of Columbia Designing Racially Equitable Legislation Toolkit](#)

This is a very comprehensive tool and is *explicitly* intended to be used for legislation, which could be less helpful for employees that provide technical assistance. It is ideally to be used before legislation is introduced, but there could be value in using this tool when considering proposed legislation. This toolkit is a fillable worksheet which is helpful. This tool asks respondents to provide baseline data on racial disparities, information on the proposed measure, the historical roots of the disparities that the measure seeks to address, assess the benefits and burdens of the measure and to determine community members that should provide input on the issue.

3. [Government Alliance on Race and Equity Toolkit](#)

This six-step toolkit begins with a helpful overview of what a racial equity tool is, who should use it, and when it should be used. These steps include an evaluation of desired outcomes and results, data analysis, ways to ensure community engagement, assessment of benefits and burdens, development of an implementation plan and evaluation and communication of results. In each step, there are examples and additional information and resources. This resource also contains a quick analysis tool with only three questions to consider if there isn't sufficient time for a longer analysis. This tool encourages both quantitative and qualitative data analysis. The main drawback to this tool is the amount of time that it may take to complete the analysis.

4. [Minneapolis Racial Equity Impact Analysis](#)

This analysis starts with helpful background information. It begins by asking the respondent to consider the outcome of a policy and then the next step is to identify the data that will help them to understand the outcome of the policy/program on communities of color. The tool contains five domains addressing the areas of outcome,

data, community engagement, analysis and evaluation. The respondent is led through an analytic process rather than just answering questions. This could be helpful when an organization is designing a policy rather than evaluating a proposed policy.

5. [Othering and Belonging Institute Structural Racism Remedies Project](#): This essay is an overview of policy-based recommendations for addressing structural or systemic racism. The findings span a variety of policy areas, including police reform, education and finance. With regard to housing, there are recommendations on homeownership subsidies, rental assistance, and reparations. The recommendations highlight the need for homeownership for Blacks despite disparities in homeownership rates, home values and home equity. There is a lack of portability for rental assistance which contributes to racial segregation due to the refusal of landlords to accept vouchers or rental assistance. The essay notes a recent attempt to subsidize home ownership on a racial basis through the creation of a “reparations fund” in Evanston, Illinois in 2019.
  
6. [Policy Link: A CEO Blueprint for Racial Equity](#): Policy Link and several other organizations collaborated to produce guidelines that can help organizations to analyze their impact on racial equity. The blueprint includes internal, external and social recommendations. The internal recommendations include a redesign of human resource policies that are “actively” antiracist, expanding worker power and voice and designing products and services that center racially equitable outcomes. External recommendations call for a redesign of corporate philanthropy to address structural problems, advocacy on local policies that address inequalities and support for environmental justice. At the societal level, there are additional calls for lobbying and advocacy to reduce racialized inequalities, increased investment for communities of color and the elevation of non-White voices in external communications.
  
7. [Race Forward Racial Justice Impact Assessment](#)  
 This assessment begins with background materials on racial impact assessments, the rationale supporting its use, and when to use them. The tool has ten questions that can be used to evaluate potential adverse consequences of proposed policies. The questions address the use and identification of stakeholders, racial inequity root cause analysis, consideration of adverse and equitable impacts, ensuring viability and sustainability, an examination of alternatives or improvements and identifying success indicators. While data isn’t a separate category, data is discussed in the context of ongoing data collection to ensure viability and sustainability.

*II. BIPOC Developer Initiatives*

| <u>Organization</u>        | <u>Description</u>   |
|----------------------------|--|
| <a href="#">Aequo Fund</a> | This fund assists BIPOC developers with launching their first project or with expanding their portfolios. This fund is operating in five |



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|   | cities and was started by an African-American developer.   |
| <a href="#"><u>Black Developer Capital Initiative</u></a>                                 | This is a partnership between LIIF and the National Affordable Housing Trust to support the growth of Black-led affordable housing developers. This program provides a line of credit to developers and utilizes the Low Income Housing Tax Credit Equity Fund.  |
| <a href="#"><u>City of St. Paul: Emerging and BIPOC Developer Training Initiative</u></a> | This is a partnership between the City of St. Paul and NEOO Partners aimed at increasing the representation of emerging BIPOC developers in real estate development.   |
| <a href="#"><u>Community Preservation Corporation</u></a>                                 | The ACCESS program is designed to remove barriers to entry for BIPOC real estate developers through capacity building.   |
| <a href="#"><u>CSH Race Initiative</u></a>  | The goals of the RACE initiative are to increase the number of loans and investments provided by CSH to BIPOC-led groups, increase CSH's overall investment in BIPOC groups, provide BIPOC developers with technical assistance and advance policies that reduce barriers for BIPOC developers to access capital.          |
| <a href="#"><u>Enterprise Community Partners</u></a>                                      | This is a five-year, \$3.5 billion program aimed at assisting BIPOC housing providers. The program will fill gaps in capital for BIPOC developers, strengthening BIPOC housing providers through financial and nonfinancial support and creating new career pathways to diversity real estate.                             |
| <a href="#"><u>Leviticus Fund</u></a>   | This faith-based organization implemented the EDREE (Empowering Diverse Real Estate Entrepreneurs) program to assist emerging and experienced BIPOC developers with technical assistance and training and financial support.   |
| <a href="#"><u>Wells Fargo Growing Diverse Housing Developers of Color Initiative</u></a> | On behalf of Wells Fargo, Capital Impact Partners, LIIF, and the Reinvestment Fund have partnered to implement this \$30 million initiative to increase the supply of affordable housing and to support the sustained growth and financial independence of BIPOC firms.  |
| <a href="#"><u>LISC</u></a>   | LISC has several initiatives aimed at developers of color. There is a \$100K matching grant program for developers of color to cover pre-development expenses to grow the pipeline of these professionals to ensure that the Detroit Affordable Housing Leverage Fund includes at least 30% developers of color. LISC also |

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|--|---|
|  | has a <a href="#">program</a> in New York City to assist minority developers to expand their capacity and access. |
|--|---|