

## Overview of the 2024 High Opportunity Areas File

### Synopsis

The Federal Housing Enterprises Financial Safety and Soundness Act of 1992 establishes a duty for Fannie Mae and Freddie Mac (the Enterprises) to facilitate a secondary market for mortgages for very low-, low-, and moderate-income families in three specified underserved markets – manufactured housing, affordable housing preservation, and rural housing.<sup>1</sup> FHFA’s Duty to Serve regulation provides eligibility for Duty to Serve extra credit under each of the three underserved markets for activities that promote “residential economic diversity,” as defined in the regulation.<sup>2</sup> Residential economic diversity activities include eligible Enterprise activities in connection with mortgages on affordable housing in “high opportunity areas,” as defined in the regulation and FHFA’s Evaluation Guidance.<sup>3</sup>

FHFA’s 2024 High Opportunity Areas File designates the specific census tracts that qualify as high opportunity areas for purposes of residential economic diversity activities. Described below are the criteria FHFA used to identify high opportunity areas for purposes of determining eligibility for extra credit under the Duty to Serve.

### “High Opportunity Area” Defined

The Duty to Serve regulation, as further specified in the Evaluation Guidance, defines “high opportunity area” to mean:

An area designated by the Department of Housing and Urban Development (HUD) as a “Difficult Development Area” (DDA) during any year covered by an Enterprise’s Underserved Markets Plan (Plan) or in the year prior to a Plan’s effective date, whose poverty rate falls below 10 percent (for metropolitan areas) or 15 percent (for non-metropolitan areas).

Or

An area designated by a state or local Qualified Allocation Plan (QAP) as a high opportunity area whose poverty rate falls below 10 percent (for metropolitan areas) or 15 percent (for non-metropolitan areas).<sup>4</sup>

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<sup>1</sup> 12 U.S.C. § 4565.

<sup>2</sup> 12 C.F.R. §§ 1282.1, 1282.36(c)(3).

<sup>3</sup> 12 C.F.R. § 1282.1.

<sup>4</sup> Duty to Serve Evaluation Guidance 2024-7, pp. 18-20.

## 1. Identifying Difficult Development Areas that Qualify as Duty to Serve High Opportunity Areas

For purposes of the first component of FHFA’s definition of high opportunity area, FHFA used HUD’s 2024 DDA data to determine metropolitan DDAs, which are based on ZIP Code Tabulation Area (ZCTA),<sup>5</sup> and non-metropolitan DDAs, which are based on county or county equivalent.<sup>6</sup>

FHFA first identified each 2020 census tract as either metropolitan or non-metropolitan, depending on whether the tract was located within a county belonging to a defined metropolitan area.<sup>7</sup> FHFA then performed a poverty screen to determine each tract’s eligibility for a high-opportunity area designation.

FHFA examined three sets of poverty estimates from the American Community Survey (ACS): 2018-2022 5-year estimates; 2017-2021 5-year estimates, and 2016-2020 5-year estimates.<sup>8</sup> A metropolitan census tract with a poverty rate of less than 10 percent in at least two of the three sets of ACS data is considered eligible for a high opportunity area designation for Duty to Serve purposes. Similarly, a non-metropolitan census tract with a poverty rate of less than 15 percent in at least two of the three sets of ACS data is considered eligible for a high opportunity area designation for Duty to Serve purposes.

Metropolitan census tracts that passed the poverty eligibility screen and that were linked to HUD metropolitan DDAs are considered high opportunity areas for Duty to Serve purposes.<sup>9</sup> Non-metropolitan census tracts that passed the poverty eligibility screen and that were linked to HUD non-metropolitan DDAs are considered high opportunity areas for Duty to Serve purposes.

The 2024 High Opportunity Areas File shows the census tracts that qualify as high opportunity areas under this first component of FHFA’s definition of high opportunity area.

## 2. Identifying State-Defined High Opportunity Areas that Qualify as Duty to Serve High Opportunity Areas

For purposes of the second component of FHFA’s definition of high opportunity area, the Evaluation Guidance states that FHFA has elected to use state or local definitions of high opportunity areas (or similar terms) contained in Low-Income Housing Tax Credit (LIHTC) QAPs or QAP-related materials that meet the following criteria:

1. The definitions are clearly intended to describe areas that provide strong opportunities for the residents of housing funded through the QAP. Use of terminology such as “high opportunity

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<sup>5</sup> <https://www.census.gov/geo/reference/zctas.html>.

<sup>6</sup> <https://www.huduser.gov/portal/datasets/qct.html>.

<sup>7</sup> <https://www.census.gov/geographies/reference-files/time-series/demo/metro-micro/delineation-files.html>. MSA delineations are typically made at the county level. However, per Office of Management and Budget (OMB) definitions, parts of Crawford County, MO located within Sullivan City, are defined as part of the St. Louis MO-IL MSA, even though the rest of Crawford County is not part of this MSA. FHFA identified two census tracts in Crawford County that intersected with Sullivan City and designated these tracts as metropolitan tracts as part of the St. Louis MO-IL MSA. <https://www.whitehouse.gov/wp-content/uploads/2023/07/OMB-Bulletin-23-01.pdf>

<sup>8</sup> Poverty rate estimates were taken from ACS Table S107.

<sup>9</sup> FHFA used Census relationship files to link 2020 Census tracts to ZCTAs. In cases where a tract overlapped multiple ZCTAs, the tract was assigned to the ZCTA with the greatest land area overlap. Census relationship files are available here: <https://www.census.gov/geographies/reference-files/2020/geo/relationship-files.html> - zcta.

areas,” “very high opportunity areas,” “areas of opportunity,” “opportunity areas,” or “economic integration areas” (singular or plural) can be helpful in signaling this intent;

and

2. The QAP describes the location of the areas in sufficient detail to enable them to be mapped or includes a list(s) or map(s) of such high opportunity areas.<sup>10</sup>

The Evaluation Guidance further states that areas with a poverty rate at or above 10 percent in metropolitan areas and at or above 15 percent in non-metropolitan areas will be excluded from FHFA’s definition of high opportunity area (poverty rate screen).<sup>11</sup>

To identify which state or local QAPs define high opportunity areas that meet the above criteria, FHFA first identified state or local QAPs that take into account location criteria designed to promote opportunity or residential economic diversity for purposes of scoring LIHTC applications.

FHFA then reviewed those QAPs to determine which specific census tracts qualify as such high opportunity areas, using data that is publicly available or available upon request from the state housing finance agency. Information on each of the state or local QAPs is provided below.

Based on that analysis, FHFA determined that 32 states have QAPs that define high opportunity areas meeting the above criteria, before applying the poverty rate screen.

FHFA then applied the same poverty rate screen used above to identify tracts eligible for a high opportunity designation under the second component of FHFA’s definition of high opportunity area. FHFA first identified each 2020 census tract as either metropolitan or non-metropolitan, depending on whether the tract was located within a county belonging to a defined metropolitan area.<sup>12</sup> FHFA then performed a poverty screen to determine each tract’s eligibility for a high opportunity area designation. FHFA examined three sets of poverty estimates from the ACS: 2018-2022 5-year estimates; 2017-2021 5-year estimates, and 2016-2020 5-year estimates.<sup>13</sup> A metropolitan census tract with a poverty rate of less than 10 percent in at least two of the three sets of ACS data is considered eligible for a high opportunity area designation for Duty to Serve purposes. Similarly, a non-metropolitan census tract with a poverty rate of less than 15 percent in at least two of the three sets of ACS data is considered eligible for a high opportunity area designation for Duty to Serve purposes.

Census tracts that passed the poverty eligibility screen and that were treated as high opportunity areas by a QAP are considered high opportunity areas for Duty to Serve purposes. The 2024 High Opportunity Areas File identifies the census tracts that qualify as high opportunity areas solely under this second component of FHFA’s definition of high opportunity area. The File also identifies the census tracts that qualify as high opportunity areas under both the first and second components of FHFA’s definition of high opportunity area.

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<sup>10</sup> Duty to Serve Evaluation Guidance 2024-7, pp. 18-20.

<sup>11</sup> Duty to Serve Evaluation Guidance 2024-7, pp. 18-20.

<sup>12</sup> <https://www.census.gov/geographies/reference-files/time-series/demo/metro-micro/delineation-files.html>.

<sup>13</sup> Poverty rate estimates were taken from ACS Table S107.

Some state QAPs include a section related to opportunity in which they assign different numbers of points to areas that meet different criteria. In such cases, FHFA needed to determine which of these criteria should be used to define high opportunity areas for Duty to Serve purposes. To make this determination, FHFA applied the following decision criteria:

- Multi-category scoring systems: Some state QAPs use a multi-category scoring system in which different numbers of points are assigned to a limited number of definitions of opportunity areas. For states with such systems, FHFA selected the category allocated the highest number of points to ensure that the areas identified by FHFA are those truly considered high opportunity by the state.
  - Exception: If a state used a term like “high opportunity” to refer to more than one category, FHFA selected each category that had this designation.
- Composite scoring systems: Some state QAPs use a composite scoring system that assigns points for different high opportunity area characteristics, and then adds up all of the points achieved to produce a combined point total. For states with such systems and different scoring tiers, FHFA applied the following criteria to identify high opportunity areas for Duty to Serve purposes:
  - A census tract assigned the highest possible combined points total was counted as a high opportunity area.
  - For census tracts receiving the next highest possible combined points total, if 70% or more of these tracts passed the Duty to Serve poverty rate screen, then all of the tracts in this category were counted as high opportunity areas.
  - FHFA continued this process until it came to a category in which fewer than 70% of the tracts receiving a particular score met the poverty rate screen, at which point FHFA stopped and did not count any of the tracts in that category as high opportunity areas.

Where data about the quality of schools was not readily available, that criterion was not included in FHFA’s analysis. State QAPs that did not allow identification of specific census tracts were not used as a basis for identifying qualifying high opportunity areas for Duty to Serve purposes.

The following sections describe the process and criteria FHFA used in analyzing each state QAP to identify specific census tracts as potential high opportunity areas *before* applying the poverty rate screen:

## Alabama

Source: [Alabama Housing Finance Authority, 2023 Housing Credit Qualified Allocation Plan](#)

Description: The Alabama Housing Finance Authority's (AHFA) QAP uses census tract characteristics to break ties in cases where applications have received the same number of scoring points (pg. A-2). In such cases, AHFA prioritizes projects located in census tracts where the 2020 estimated median family income is equal to 100 percent or more of the county's median family income published by HUD. FHFA identified census tracts where the 2020 median family income was equal to 100 percent or more of the county's median family income as potential high opportunity areas for the Duty to Serve program.

## Alaska

Source: [Alaska Housing Finance Corporation, Rating and Award Criteria Plan, Version June 29 2022](#)

Description: The Alaska Housing Finance Corporation's (AHFC) QAP awards up to 15 points to developments located in opportunity areas (pg. 29). Scoring is based on the unemployment rate information reported by the State of Alaska Department of Labor and Workforce Development. A development located in a borough or census area with an unemployment rate that is 2.5 percentage points below the statewide average is eligible for all 15 points. AHFC provided FHFA with a data file with the unemployment rates and number of points assigned to each borough or census area based on the latest available unemployment rate information. FHFA assigned each census tract the opportunity point score of the encompassing borough or census area.<sup>14</sup> FHFA identified census tracts receiving 12 points (the highest number of points assigned based on the data provided) as potential high opportunity areas for the Duty to Serve program.

## Arkansas

Source: [Arkansas Development Finance Authority, 2023 Qualified Allocation Plan](#)

Description: The Arkansas Development Finance Authority's (ADFA) QAP describes an Area of Opportunity Index (AOI) at the census tract level (pg. 22). Applications may receive up to 10 points based on the AOI score of the tract within which the development is located. The AOI, with values that award from 0-10 points, is based on unemployment rate, vacancy rate, and population growth. FHFA rounded the available points by census tract to whole numbers and determined that census tracts with a score of 10 were potential high opportunity areas for the Duty to Serve program.

## California

Source: [California Tax Credit Allocation Committee Regulations Implementing the Federal and State Low Income Housing Tax Credit Laws, California Code of Regulations, Title 4, Division 17, Chapter 1](#)

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<sup>14</sup> <https://gis.data.alaska.gov/datasets/DCCED::alaska-borough-and-census-area-boundaries/explore?location=48.876025%2C48.775726%2C3.00>

Description: The California Tax Credit Allocation Committee’s (CTCAC) QAP-related materials provide that new construction projects are eligible for 8 points if they are located in a census tract or census block group defined as a “Highest Resource” or “High Resource” area (pg. 43). California census tracts and census block groups are assigned resource ratings in Opportunity Area Maps compiled by the California Tax Credit Allocation Committee (CTAC).<sup>15</sup> FHFA used resource designations as measured by CTAC’s 2024 Opportunity Maps, the first version of these maps to align with 2020 census tract boundaries. Tracts that were designated as “high” or “highest” resource, as well as tracts that contained block groups designated as “high” or “highest” resource, were considered potential high opportunity areas for the Duty to Serve program.

### Connecticut

Source: [Connecticut Housing Finance Authority, Low Income Housing Tax Credit, 2022 and 2023 Qualified Allocation Plan](#)

Description: The Connecticut Housing Finance Authority’s (CHFA) QAP awards 9 points for projects located in census tracts designated as “Very High Opportunity” and 8 points for projects located in census tracts designated as “High Opportunity” (pg. 25). Tract designations are published online via CHFA’s statewide Opportunity Map.<sup>16</sup> CHFA provided FHFA with the data used in the online map. FHFA identified census tracts designated as “Very High Opportunity” or “High Opportunity” as potential high opportunity areas for the Duty to Serve program.

### Delaware

Source: [Delaware State Housing Authority, State of Delaware Low Income Housing Tax Credit Qualified Allocation Plan, 2023-2024](#)

Description: The Delaware State Housing Authority’s (DSHA) QAP awards points to family development proposals located in “Areas of Opportunity,” defined as areas that offer economic opportunity through proximity to jobs, high-performing schools, and other supportive infrastructure (pg. 43). DHSAs publishes an online map of defined Areas of Opportunity.<sup>17</sup> FHFA identified census tracts within or partially within an Area of Opportunity as potential high opportunity areas for the Duty to Serve program.

### District of Columbia

Source: [District of Columbia Department of Housing and Community Development, 2023 Low Income Housing Tax Credit Qualified Allocation Plan](#)

Description: The D.C. Department of Housing and Community Development’s (DHCD) QAP identifies projects located in census tracts that have less than 5 percent of residents below the poverty level and have been designated as “Upper-Income” or “Middle-Income” according to the most recent Federal Financial Institutions Examination Council (FFIEC) Census Report as eligible for a basis boost (pg. 12). Additionally, DHCD prioritizes the development of affordable housing in neighborhoods with low-crime, low-poverty, and access to high-quality schools and jobs (pg. 35). Maximum points under this criterion

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<sup>15</sup> <https://www.treasurer.ca.gov/ctcac/opportunity.asp>

<sup>16</sup> <https://www.chfa.org/about-us/ct-opportunity-map/>

<sup>17</sup> <https://www.arcgis.com/home/item.html?id=b005f75d68b64f11b05de59ad52d6a21>

are awarded to projects located in the following D.C. planning areas: Rock Creek West, Near Northwest, or Capitol Hill.<sup>18</sup> FHFA identified all census tracts in these three planning areas, as well as census tracts in other planning areas that met the FFIEC income and poverty thresholds, as potential high opportunity areas for the Duty to Serve program.

### Florida

Source: [Florida Housing Finance Corporation, 2023 Qualified Allocation Plan, Low Income Housing Tax Credit Program](#)

Description: The Florida Housing Finance Corporation's (FHFC) QAP indicates that projects located in census tracts that are designated as Areas of Opportunity can be designated as eligible for a 30% basis boost (pg. 3). FHFC publishes a list of Florida census tracts designated as Areas of Opportunity.<sup>19</sup> Designations reflect tract characteristics including median income, educational attainment, and employment. FHFA identified all census tracts included in the 2023 FHFC Geographic Areas of Opportunity List as potential high opportunity areas for the Duty to Serve program.

### Idaho

Source: [Idaho Housing and Finance Association, Low-Income Housing Tax Credit Program Qualified Allocation Plan for the State of Idaho](#)

Description: The Idaho Housing and Finance Association's (IHFA) QAP awards 2 points to developments located in Areas of Opportunity (pg. 26). To receive these points, the development's census tract must have a poverty rate that is less than or equal to the State of Idaho's overall average poverty rate. Using census tract poverty rate estimates accessed via FFIEC, FHFA identified census tracts in Idaho with poverty rates less than or equal to 10.7 percent as potential high opportunity areas for the Duty to Serve program.<sup>20</sup>

### Illinois

Source: [Illinois Housing Development Authority, 2022-2023 Low Income Housing Tax Credit Qualified Allocation Plan](#)

Description: The Illinois Housing Development Authority's (IHDA) QAP assigns Quality of Life Index (QOLI) scores ranging from 1 to 10 to Illinois census tracts. QOLI scores are based on education, economic prosperity, health, housing, and connectivity characteristics.<sup>21</sup> Projects are eligible to receive the same number of points as the QOLI score of the tract in which the project is located (pg. 39). FHFA identified census tracts with QOLI scores of 7 or higher as potential high opportunity areas for the Duty to Serve program.

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<sup>18</sup> [https://opendata.dc.gov/datasets/203c2342b36240949e0ad95d75a5bdca\\_2/explore](https://opendata.dc.gov/datasets/203c2342b36240949e0ad95d75a5bdca_2/explore)

<sup>19</sup> <https://www.floridahousing.org/programs/developers-multifamily-programs/competitive/areas-of-opportunity/2023>

<sup>20</sup> IHFA's QAP instructs applicants to compare tract poverty rates with statewide poverty rates presented on the Census Bureau's QuickFacts webpage for Idaho: <https://www.census.gov/quickfacts/ID>.

<sup>21</sup> <https://www.ihda.org/developers/market-research/quality-of-life-index/>

## Indiana

Source: [Indiana Housing and Community Development Authority, State of Indiana 2023-2024 Qualified Allocation Plan](#)

Description: The Indiana Housing and Community Development Authority's (IHCDA) QAP describes an Opportunity Index used to identify locations with high incomes, low poverty, low unemployment, high access to primary care, and high life expectancy (pg. 70). Tracts are assigned Opportunity Index scores ranging from 0 to 5, and applications can earn up to 7 points depending on the Opportunity Index score of the tract within which the development is located. IHCDA provided FHFA with a data file containing the Opportunity Index score for each Indiana census tract. FHFA identified census tracts with Opportunity Index scores of 4 or 5 as potential high opportunity areas for the Duty to Serve program.

## Kansas

Source: [Kansas Housing Resources Corporation, 2023 Qualified Allocation Plan](#)

Description: The Kansas Housing Resource Corporation's QAP awards up to 15 points to projects based on their location in "Opportunity Sites" (pg. 27). Metropolitan and rural census tracts are separated and assigned initial scores on the basis of four components: affordable housing needs, growth demand, quality of life, and economic opportunity. Tracts are then assigned a percentile ranking on their score. The application with the highest percentile ranking receives 15 points. All other applications are awarded points based on their percentage of the highest final percentile ranking. FHFA assessed the eligibility of tracts as potential high opportunity areas relative to the highest possible percentile ranking available for metropolitan and rural tracts. That is, FHFA assigned 15 points to the metropolitan and rural tracts with the highest percentile rating, and then assigned all other tracts with point values ranging from 1 to 14 on the basis of their percentage of the percentile rating of the tract that received 15 points. Based on this process, tracts with point values of 15 were identified as potential high opportunity areas for the Duty to Serve program.

## Kentucky

Source: [Kentucky Housing Corporation, 2023-2024 Qualified Allocation Plan](#)

Description: The Kentucky Housing Corporation's (KHC) QAP awards up to five points to projects on the basis of census tract characteristics related to housing stability, education, and economic security (pg. 18). Point values are assigned to 2010 census tracts on the basis of three opportunity scores from the Enterprise Opportunity360 Report. KHC provided FHFA with a data file containing the tract opportunity scores used to assign points. FHFA calculated the point score for each 2010 census tract, following the weighting procedure outlined in the QAP. Each 2020 census tract was assigned the highest of the point scores of the 2010 census tracts with which it overlapped. FHFA determined that 2020 census tracts with point scores of four or five were potential high opportunity areas for the Duty to Serve program.

## Louisiana

Source: [Louisiana Housing Corporation, 2022-2023 Qualified Allocation Plan](#)



Description: The Louisiana Housing Corporation’s (LHC) QAP awards projects up to five points on the basis of census tract median household income (pg. 39). For tracts located in metropolitan statistical areas (MSAs), tracts are eligible for three points if the tract’s median income is at least 100 percent of the MSA area median income; four points if the tract’s median income is at least 110 percent of the MSA area median income, and five points if the tract’s median income is at least 120 percent of the MSA area median income. FHFA calculated the number of points for each census tract under this scoring criterion<sup>22</sup> and identified census tracts eligible for five points as potential high opportunity areas for the Duty to Serve program.

### Maryland

Source: [Maryland Department of Housing and Community Development, Maryland Qualified Allocation Plan](#)

Description: The Maryland Department of Housing and Community Development’s (Maryland DHCD) QAP indicates that family developments located within “Communities of Opportunity” automatically qualify for a 30% basis boost (pg. 10). The Maryland DHCD designates 2010 census tracts as either “Located in a Community of Opportunity” or “Not Located in a Community of Opportunity” based on factors including community health, economic opportunity, and educational opportunity.<sup>23</sup> FHFA considered a 2020 census tract to be located in a community of opportunity if it overlapped with a 2010 census tract that was designated a Community of Opportunity in the Maryland DHCD data. FHFA identified all 2020 census tracts with a Community of Opportunity designation as potential high opportunity areas for the Duty to Serve program.

### Massachusetts

Source: [Commonwealth of Massachusetts Department of Housing and Community Development, Low-Income Housing Tax Credit Program, 2023-2024 Qualified Allocation Plan](#)

Description: The Massachusetts’ Department of Housing and Community Development’s (Massachusetts DHCD) QAP grants points to family projects located in an “area of opportunity” (Criteria B-7). Eligible projects must be located in census tracts with poverty rates below 15 percent in order to be eligible for these points. FHFA identified one mappable criterion among those listed under Criteria B-7, which awarded up to 8 points to projects based on school district performance. School districts were scored based on the average share of 10<sup>th</sup> grade students who scored in the Advanced or Proficient categories using an average of district-level results on the English Language Arts, Mathematics, and Science Massachusetts Comprehensive Assessment System (MCAS) tests.<sup>24</sup> Districts with an average of 90

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<sup>22</sup> Tract-level estimates for median income were obtained from the 2022 ACS 5-Year Estimates, Table S1903. Area median income estimates for MSAs were obtained from HUD: [https://www.huduser.gov/portal/datasets/il.html-data\\_2023](https://www.huduser.gov/portal/datasets/il.html-data_2023)

<sup>23</sup> <https://data.imap.maryland.gov/datasets/maryland::maryland-housing-designated-areas-communities-of-opportunity/about>

<sup>24</sup> <https://profiles.doe.mass.edu/staterreport/nextgenmcas.aspx>. Since 2017, MCAS tests have replaced the pre-existing Advanced, Proficient, Needs Improvement, and Warning scoring categories with new categories: Exceeding Expectations, Meeting Expectations, Partially Meeting Expectations, and Not Meeting Expectations. FHFA

percent or above were assigned 8 points. Districts with an average of 85 percent or above were assigned 6 points. Districts with an average of 80 percent or above were assigned 4 points. Districts with an average of 75 percent or above were assigned 2 points. Districts below an average of 75 percent were not assigned any points. FHFA mapped census tracts to Massachusetts school districts,<sup>25</sup> and identified eligible tracts with scores of 2 or higher as potential high opportunity areas for the Duty to Serve program.

### Mississippi

Source: [Mississippi Home Corporation, State of Mississippi 2023 Qualified Allocation Plan, Housing Tax Credit Program](#)

Description: The Mississippi Home Corporation’s (MHC) QAP identifies “High Opportunity Areas” based on median household income, population growth, median household income growth, unemployment rate, county-level hires per quarter, and high-performing school districts (pg. 60). Developments located in census tracts designated as High Opportunity Areas may receive 10 points. MHC provided FHFA with a list of census tracts that had been designated as High Opportunity Areas. FHFA identified all of these census tracts as potential high opportunity areas for the Duty to Serve program.

### Nebraska

Source: [Nebraska Investment Finance Authority, Low-Income Housing Tax Credit Program, 2022-2023 Qualified Allocation Plan](#)

Description: The Nebraska Investment Finance Authority’s (NIFA) QAP awards points to developments located in “Areas of High Opportunity” (pg. 32, 2022/2023 9% Application; pg. 30, 2022/2023 4% NIFA Application). Points are assigned to 2010 census tracts on the basis of three opportunity indices developed by diversitydatakids.org focused on education, health and environment, and social and economic factors.<sup>26</sup> Census tracts receive ratings of very low (0 points), low (0 points), moderate (0.5 points), high (0.75 points), or very high (1 point) on each index. Tracts that receive very high ratings on all three indices are awarded an additional point. Using the state-normalized opportunity index scores, FHFA calculated the point scores assigned to each 2010 census tract in Nebraska. FHFA then assigned each 2020 census tract the highest of the point scores of the 2010 census tracts with which it overlapped. FHFA identified 2020 census tracts receiving scores of 1.25 points or higher as potential high opportunity areas for the Duty to Serve program.

### Nevada

Source: [Nevada Housing Division, Low-Income Housing Tax Credit Program Qualified Allocation Plan, Final 2023 QAP](#)

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measured the average share of 10<sup>th</sup> grade students scoring Exceeding Expectations or Meeting Expectations, as these categories are most closely aligned with the pre-existing Advanced or Proficient designations referenced in the Massachusetts DHCD QAP.

<sup>25</sup> <https://gis.data.mass.gov/maps/massgis::massachusetts-public-school-districts/about>

<sup>26</sup> <https://data.diversitydatakids.org/dataset/coi20-child-opportunity-index-2-0-database/resource/080cfe52-90aa-4925-beaa-90efb04ab7fb>

Description: The Nevada Housing Division’s QAP indicates that projects located in census tracts classified as “High Income” or “Middle Income” by FFIEC are eligible for a 30 percent basis boost (pg. 31).<sup>27</sup> FHFA identified all of these census tracts as potential high opportunity areas for the Duty to Serve program.

### New York

Source: [New York State Homes and Community Renewal, Request for Proposals, Multifamily Programs, HCR Multifamily Finance 9% RFP – Fall 2023](#)

Description: The New York State Homes and Community Renewal’s (NYSHCR) QAP-related material<sup>28</sup> requires applicants to advance State Housing Goals. The third State Housing Goal is for “Projects in Well-Resourced Areas” (WRAs). WRAs are described as census tracts with poverty rates below 10 percent that are located in school districts that outperform state median standardized test scores (pg. 11). NYSHCR publishes a map that identifies census tracts designated as eligible WRAs in 2020 and in 2022.<sup>29</sup> FHFA identified all census tracts designated as eligible WRAs in 2022 as potential high opportunity areas for the Duty to Serve program.

### Oklahoma

Source: [Oklahoma Housing Finance Agency, Affordable Housing Tax Credits Program \(AHTC\), 2023 Application Instructions](#)

Description: The Oklahoma Housing Finance Agency’s QAP awards five points to developments located in ZIP codes where the poverty rate is below the statewide average, or where the median household income exceeds the statewide average (pgs. 26-27).<sup>30</sup> FHFA identified Oklahoma ZIP Code Tabulation Areas (ZCTAs) that qualified as high opportunity areas under either of these criteria.<sup>31</sup> FHFA then identified census tracts that intersected a ZCTA with a high opportunity area designation as potential high opportunity areas for the Duty to Serve program.

### Ohio

Source: [Ohio Housing Finance Agency, 2023 Qualified Allocation Plan Technical Amendment](#)

Description: The Ohio Housing Finance Agency’s (OHFA) QAP describes multiple criteria that take into account a development’s location in a high or very high opportunity area. Points may be awarded for location in a high or very high opportunity area (pg. 42), and developments located in these areas may be eligible for a discretionary basis boost (pg. 28) and set-aside award (pg. 30). OHFA defines high and very high opportunity census tracts using an opportunity index developed by The Ohio State University’s

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<sup>27</sup> <https://www.ffiec.gov/census/default.aspx>

<sup>28</sup> NYSHCR’s Multifamily Finance 9% LIHTC RFP.

<sup>29</sup> <https://nyshcr.maps.arcgis.com/apps/webappviewer/index.html?id=b0ca4a8432104bb4ac71fb576ee51175>

<sup>30</sup> <https://www.census.gov/quickfacts/fact/table/OK/PST045222>

<sup>31</sup> ZCTA poverty-rate estimates are taken from ACS 2022 5-Year Estimates, Table S1701. ZCTA median income estimates are taken from ACS 2022 5-Year Estimates, Table S1903.

Kirwan Institute.<sup>32</sup> OHFA provided FHFA with a data file identifying Ohio census tracts with high or very high opportunity ratings. FHFA identified all of these tracts as potential high opportunity areas for the Duty to Serve program.

### Oregon

Source: [State of Oregon, Qualified Allocation Plan for Low Income Housing Tax Credits, Revised December 22, 2022](#)

Description: The Oregon Housing and Community Services' (OHCS) QAP awards up to five points for "Location Opportunity and Environmental Factors" (pgs. 37-38). Among these factors, FHFA identified the following mappable, opportunity-focused criteria: projects were eligible to receive one point if they were located in census tracts where 50 percent or more of households had earned more than 100% of the area median income in the previous three consecutive years for which data was available, and the poverty rate had been less than or equal to 20% during the same period.<sup>33</sup> FHFA identified census tracts that met these income and poverty criteria as potential high opportunity areas for the Duty to Serve program.

### Pennsylvania

Source: [Pennsylvania Housing Finance Agency, 2022 Qualified Allocation Plan](#)

Description: The Pennsylvania Housing Finance Agency's (PHFA) QAP awards up to 7 points to general occupancy developments based on the "Opportunity Score" of the ZIP code in which the development is located.<sup>34</sup> PHFA assigns "Opportunity Scores" ranging from 0 to 6 to ZIP codes, with higher scores assigned to: ZIP codes with "low poverty rates; limited affordable housing options, both subsidized and non-subsidized; limited affordable housing production in the past twenty (20) years; close proximity to employment; strong housing markets; and high owner-occupied markets" (pg. 34). PHFA publishes a file of Pennsylvania ZIP codes and their Opportunity Scores.<sup>35</sup> FHFA assigned each 2020 census tract the highest of the Opportunity Scores of the ZIP codes with which it overlapped. FHFA then identified census tracts with an Opportunity Score of 5 or higher as potential high opportunity areas for the Duty to Serve program.

### Rhode Island

Source: [Rhode Island Housing, State of Rhode Island 2023 Qualified Allocation Plan](#)

Description: Rhode Island Housing's (RI Housing) QAP awards points to projects based on their location in "Areas of Opportunity" (pgs. 37-38). Up to 2 points may be awarded to projects located in communities based upon local high school graduation rates. Communities with high school graduation

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<sup>32</sup><https://ohiohome.org/ppd/documents/2024-25-USR-OpportunityIndex.pdf>

<sup>33</sup> Tract-level estimates for median household income were taken from the 2022, 2021, and 2020 ACS 5-Year Estimates, Table S1903. Area median income estimates are published annually by HUD. FHFA used the estimates for FY2023, FY2022, and FY2021.

<sup>34</sup> Details regarding how these points are assigned on the basis of ZIP code Opportunity Scores are provided here: [https://www.phfa.org/forms/multifamily\\_application\\_guidelines/presentation/2024-community-impact-scoring-forms.pdf](https://www.phfa.org/forms/multifamily_application_guidelines/presentation/2024-community-impact-scoring-forms.pdf)

<sup>35</sup> [https://www.phfa.org/forms/multifamily\\_application\\_guidelines/presentation/2024-community-impact-scoring-data.pdf](https://www.phfa.org/forms/multifamily_application_guidelines/presentation/2024-community-impact-scoring-data.pdf)

rates greater than or equal to 92 percent are eligible for the maximum 2 points awarded under this criterion. FHFA mapped census tracts to Rhode Island school districts and assigned points to tracts on the basis of school district graduation rates.<sup>36</sup> FHFA identified census tracts receiving the maximum 2 points awarded under this criterion as potential high opportunity areas for the Duty to Serve program.

### South Dakota

Source: [South Dakota Housing Development Authority, Low Income Housing Tax Credit 2022-2023 Qualified Allocation Plan](#)

Description: The South Dakota Housing Development Authority's (SDHDA) QAP awards up to 20 points to projects based on their location in an Area of Opportunity (pg.30-31). Up to 15 points are awarded to census tracts based on low poverty rates (5 points), high ratios of jobs to population (5 points), and below average unemployment (5 points). SDHDA provided a data file to FHFA for their online Area of Opportunity map, providing a point score (0-15) for each 2010 census tract.<sup>37</sup> FHFA assigned each 2020 census tract the highest of the point scores of the 2010 census tracts with which it overlapped. Based on FHFA's analysis of the SDHDA's composite scoring system, FHFA identified census tracts receiving scores of 10 or higher (e.g., those that meet two of the three mappable criteria) as potential high opportunity areas for the Duty to Serve program.

### Texas

Source: [Texas Department of Housing and Community Affairs, 2023 Qualified Allocation Plan](#)

Description: Section 11.9(c)(5) of the Texas Department of Housing and Community Affairs' (TDHCA) QAP details an "Opportunity Index" under which developments may be eligible for up to seven opportunity index points (pgs. 62-67). FHFA determined that two of the criteria in the Opportunity Index were mappable at the census tract level using data provided by TDHCA. These criteria assigned points to applications based on comparisons between the census tract of the proposed development and other census tracts located in the development's uniform state service region.<sup>38</sup> Developments were eligible for two points if they were located in tracts where the poverty rate was either (i) less than 20 percent, or (ii) the median poverty rate among tracts within the development's Texas uniform service region (whichever was greater) *and* where the tract median household income was in the highest two quartiles among tracts within the development's uniform state service region. Developments located in tracts that were eligible for these two points could also receive a third point if 27 percent or more of adults in the tracts had attained an Associate's degree or higher. FHFA identified census tracts eligible for three points under these mappable criteria as potential high opportunity areas for the Duty to Serve program.

### Utah

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<sup>36</sup> School district graduation rates are reported in Table 54 of the Rhode Island Kids Count Factbook: [https://www.rikidscount.org/Portals/0/Uploads/Documents/Factbook\\_2022/Education\\_section.pdf?ver=2022-05-12-085914-057](https://www.rikidscount.org/Portals/0/Uploads/Documents/Factbook_2022/Education_section.pdf?ver=2022-05-12-085914-057)

<sup>37</sup> <https://sdhda.maps.arcgis.com/apps/MapTools/index.html?appid=f2cc4768b4444109a15bb977907fcb7d>

<sup>38</sup> TDHCA publishes a map of Texas' uniform state service regions here: <https://www.tdhca.texas.gov/sites/default/files/SFHP-division/htf/aybr-docs/docs/SvcRegionMap.pdf>

Source: [Utah Housing, State of Utah 2022-2023 Federal and State Housing Credit Program Allocation Plan](#)

Description: The Utah Housing Corporation’s (UHC) QAP awards points to incentivize housing development in high opportunity areas (pg. 137). Developments located in Davis County, Salt Lake County, Utah County, or Weber County may receive up to 5 points and a 30 percent basis boost based on an Opportunity Index Score developed by the Kem C. Gardner Policy Institute at the University of Utah. UHC provided FHFA with a data file containing the number of points assigned to each tract in these four counties. Because Opportunity Index Scores were assigned to 2010 census tracts, FHFA assigned each 2020 census tract in these select counties the highest of the Opportunity Index Scores of the 2010 census tracts with which it overlapped. Developments located in all other Utah counties may receive up to 5 points based on the census tract poverty rate. Tracts with poverty rates of 5 percent or less are eligible to receive the full 5 points. FHFA identified census tracts receiving the maximum possible number of “Areas of Opportunity” points (5) as potential high opportunity areas for the Duty to Serve program.

### Virginia

Source: [Virginia Housing Development Authority, The Plan of the Virginia Housing Development Authority for the Allocation of Low-Income Housing Tax Credits, Amended Effective January 1, 2022](#)

Description: The Virginia Housing Development Authority’s (VHDA) QAP awards points to elderly or family developments located in census tracts with poverty rates below 3 percent (30 points), 10 percent (25 points), and 12 percent (20 points) (pg. 14). FHFA identified census tracts with poverty rates of 3 percent or less – the category providing the highest number of points in the QAP – as potential high opportunity areas for the Duty to Serve program.

### Washington

Source: [Washington State Housing Finance Commission, 9% Competitive Housing Tax Credit Policies, 2023](#)

Description: The Washington State Housing Finance Commission’s (WSHFC) QAP provides one point for projects located in King County census tracts defined as “High” or “Very High” opportunity based on the Puget Sound Regional Council’s Comprehensive Opportunity Index (pg. 65).<sup>39</sup> FHFA identified these King County census tracts as potential high opportunity areas for the Duty to Serve program.

### West Virginia

Source: [West Virginia Housing Development Fund, Low-Income Housing Tax Credit Program, 2023 and 2024 Allocation Plan](#)

Description: The West Virginia Housing Development Fund’s (WVHDF) QAP awards points for developments in a High Opportunity Location (pgs. 49-56). For new housing development, up to 90

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<sup>39</sup> <https://psrc-psregcncl.hub.arcgis.com/datasets/PSREGCNCL::opportunity-index-equity-tracts/explore?location=47.505501%2C-121.980146%2C8.27>

points are available based on census tract-level 2017-2021 ACS 5-year estimates. Of these, 10 points are available for each of six characteristics mappable at the census tract level (for a total of up to 60 points): a high percentage of owner-occupied housing; a low percentage of households with more than one occupant per room; low rates of poverty; a low percentage of households receiving Food Stamps/SNAP; low rates of unemployment; and high rates of educational attainment. Additional High Opportunity Location points are available based on the performance of the public school district and for proximity to public transportation. WVHDF provided a file to FHFA with tract-level scores for the six census tract-level opportunity criteria. FHFA identified census tracts that scored at least 50 points on these criteria as potential high opportunity areas for the Duty to Serve program.

### Wisconsin

Source: [Wisconsin Housing and Economic Development Authority, Qualified Allocation Plan for the State of Wisconsin, 2023-2024](#)

Description: The Wisconsin Housing and Economic Development Authority’s (WHEDA) QAP awards up to 28 points to projects located in “Areas of Opportunity” (pg. 13). Of the opportunity scoring criteria defined in WHEDA’s 2023 9% LIHTC Application, FHFA determined that one criterion was mappable at the census tract level.<sup>40</sup> Developments located in census tracts where the tract median income was at or above 120 percent of county median income were eligible to receive 5 points. Developments located in census tracts where the tract median income was at or above 100 percent of county median income were eligible to receive 3 points. Using an application scoring workbook made available by WHEDA, FHFA identified census tracts with median incomes at or above 120 percent of county median income – the category providing the highest number of mappable opportunity points – as potential high opportunity areas for the Duty to Serve program.<sup>41</sup>

### **3. High Opportunity Areas File (January 2024)**

FHFA’s 2024 High Opportunity Areas File provides a list of all census tracts that qualify as high opportunity areas for purposes of the Duty to Serve program. As described above, classification of census tracts as metropolitan or non-metropolitan is based on the U.S. Census Bureau’s 2020 delineation files for core based statistical areas, which include metropolitan statistical areas.<sup>42</sup>

The 2024 High Opportunity Areas File is column formatted and has eight fields, values of which may have leading zeros.

STATE:	2-digit numeric state FIPS code.
COUNTY:	3-digit numeric county FIPS code.
TRACT:	6-digit 2020 census tract code (2 decimals implied).
FIPS11:	Full 11-digit FIPS code identifying unique census tract.

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<sup>40</sup> <https://www.wheda.com/developers-and-property-managers/tax-credits/htc/allocating/2023/2023-program>

<sup>41</sup> Tract-level scores are assigned under this criterion in Appendix R: <https://www.wheda.com/developers-and-property-managers/tax-credits/htc/allocating/2023/2023-appendices>

<sup>42</sup> <https://www.census.gov/geographies/reference-files/time-series/demo/metro-micro/delineation-files.html>



MSA23:	5-digit CBSA designator representing the MSA as specified in OMB Bulletin No. 23-01 (July 21, 2023). <sup>43</sup> ‘99999’ represents a non-metropolitan area. <sup>44</sup>
HIGH_OPP:	1-digit code indicating whether the tract is located in a high opportunity area. Data users should use this field to identify high opportunity area census tracts for purposes of the Duty to Serve program. See below for additional details.
DDA_FLAG:	1-digit code that takes a value of 1 if the tract is located within or overlaps with a HUD-defined Difficult Development Area (DDA), or 0 if the tract does not. <sup>45</sup> Data users should be aware that the DDA_FLAG field identifies all DDA tracts regardless of whether or not these tracts pass the poverty screen step described above. The DDA_FLAG field does <i>not</i> identify high opportunity area census tracts for purposes of the Duty to Serve program.
QAP_FLAG:	1-digit code that takes a value of 1 if the tract was identified as meeting the state-specific high opportunity area criteria described above, prior to the implementation of the poverty screen, or 0 if the tract does not meet those criteria. Data users should be aware that the QAP_FLAG field does <i>not</i> identify high opportunity area census tracts for purposes of the Duty to Serve program.

The HIGH\_OPP field can be interpreted as follows:

- HIGH\_OPP =1, census tract is located in a high opportunity area for purposes of the Duty to Serve program based on the DDA analysis only
- HIGH\_OPP =2, census tract is located in a high opportunity area for purposes of the Duty to Serve program based on the QAP analysis only
- HIGH\_OPP =3, census tract is located in a high opportunity area for purposes of the Duty to Serve program based on both the DDA analysis and the QAP analysis
- HIGH\_OPP =0, census tract is not located in a high opportunity area for purposes of the Duty to Serve program

The 2024 High Opportunity Areas File is a census tract level file covering all metropolitan and non-metropolitan areas in the 50 states, the District of Columbia, and Puerto Rico. Census tract records for U.S. territories (other than Puerto Rico) are not included as they are not considered high opportunity areas for purposes of the Duty to Serve program.

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<sup>43</sup> <https://www.whitehouse.gov/wp-content/uploads/2023/07/OMB-Bulletin-23-01.pdf>

<sup>44</sup> “Non-metropolitan” areas include Micropolitan Statistical Areas.

<sup>45</sup> Census tracts in non-metropolitan areas are considered DDA tracts if they fall inside a county defined as a non-metropolitan DDA by HUD. Census tracts in metropolitan areas are considered DDA tracts if the tract’s ZCTA is defined as a metropolitan DDA by HUD. Census tracts that overlap multiple ZCTAs are linked to the ZCTA with which they share the greatest overlapping land area.



For questions concerning the format of the 2024 High Opportunity Areas File, please contact:  
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