

A Guide for Financing Radon Mitigation To Reduce Exposure in Existing Housing

December 2009

*Produced by the Alliance for Healthy Homes under Agreement XA-83308801-0
with the Environmental Protection Agency, Office of Indoor Air and Radiation*

Table of Contents

	Page #
Introduction	1
Federal Grants and Loans for repair/rehab:	
US Department of Housing and Urban Development HOME, CDBG, NSP	2
Federal Housing Administration and HUD Insured Loans	4
US Department of Agriculture Rural Development Housing Programs	5
Mortgage Incentives: Community Reinvestment Act	6
Housing Trust Funds	7
Financing for Projects to Repair Multiple Homes	
Low Income Housing Tax Credit	8
New Markets Tax Credit	8
Rural Multifamily Rental Housing Loans	9
Appendix 1: Key Opportunities to Influence Funding Decisions	
Consolidated Plan	10
Qualified Allocation Plan	11
Appendix 2: Other Sources of Funding and Information	12

Introduction

Equipped with clear information about radon, radon testing, mitigation, RRNC, relevant standards, and financing mechanisms, the public health and affordable housing communities can help families to reduce radon in their own properties and advance radon mitigation on a community-wide basis by making the best use of affordable housing programs and other housing delivery systems' resources and expertise. The goal of this guide is to educate public health leaders, radon programs, lung cancer prevention advocates, and housing and community development professionals about existing financing mechanisms that can support radon mitigation in existing dwelling units. The key financing mechanisms are summarized, with web links, regulatory/statutory citations, and similar basic information. The first appendix highlights opportunities for targeting investments by influencing program policies and practices through mechanisms such as HUD-required consolidated plans and State's Qualified Allocation Plans. The second appendix offers leads to additional information and resources.

The reader is reminded that there is no perfect or fully-funded mechanism to meet the need for radon mitigation, and therefore, to get to scale, obtaining assistance for at-risk properties involves seeking prioritization of radon mitigation through set-asides, favorable financing terms, and other means of ready access to resources; and encouraging financial institutions to make strategic investments in radon mitigation. This effort may be achieved most sustainably by collaborating on advocacy for the correction of all housing-related health hazards in the same dwelling units. As well, multi-purpose funding is needed to leverage categorical programs such as weatherization that fix one problem at a time, so that any federal assistance leaves each unit improved across the spectrum of environmental health hazards. Moreover, federal, state, and local governments should enact standards to prevent exposure to radon, so that market forces will factor radon mitigation into housing transactions and grow community capacity for radon testing, mitigation, and education. For more information, please contact jmalone@afhh.org.

Federal Grants and Loans for repair/rehab

US Department of Housing and Urban Development (HUD) Block Grants

Block grants such as the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program, and the Neighborhood Stabilization Program (NSP) deliver funds to communities to run programs that meet locally defined needs within the context of federal rules. CDBG and NSP funds are awarded to entitlement areas (designated cities and some urban counties) and states (to cover areas in need not in the entitlement areas; HOME target areas are slightly different). The formulas for determining amounts awarded by HUD to each jurisdiction consider factors of population, poverty, housing age, overcrowding, and urban density. The use of funds is governed by a grantee's Consolidated Plan, which spans three to five years and must be developed with citizen participation (see Appendix 1). For more on block grants, see <http://www.hud.gov/offices/cpd/communitydevelopment/programs/>

The Community Development Block Grant (CDBG) Program was created (at 42 USC section 5301) in 1974 to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. Housing condition is expressly addressed in two Congressional objectives: elimination of conditions which are detrimental to health, safety, and public welfare, through code enforcement, demolition, interim rehabilitation assistance, and related activities; and conservation and expansion of the Nation's housing stock in order to provide a decent home and a suitable living environment for all persons, but principally those of low and moderate income. At least 70% of the funds must directly benefit people with low-and moderate incomes.

CDBG receives \$3.6-4 billion each year. Cities and state agencies run the CDBG program locally with formula grant funds awarded by US Department of Housing and Urban Development. The annual CDBG appropriation is allocated between States and local jurisdictions called "non-entitlement" and "entitlement" communities respectively. Entitlement communities are comprised of central cities of Metropolitan Statistical Areas (MSAs); metropolitan cities with populations of at least 50,000; and qualified urban counties with a population of 200,000 or more (excluding the populations of entitlement cities). States distribute CDBG funds to non-entitlement localities not qualified as entitlement communities.

CDBG is not targeted exclusively to housing and there is no federal requirement for any particular activity, although no more than 15% of the grant may be spent on public services. CDBG was designed to address conditions internal to dwelling units and neighborhood-wide concerns because urban communities needed attention to both in order to become and remain viable. In practice, most communities invest in housing and use CDBG funds for rehabilitating housing in multifamily properties and groups of single family homes. Many also offer a home repair program to assist low-income property owners (typically owner occupants) with the repair of heaters, electrical service, roofs, plumbing, and other basic systems, or to add

accessibility features, or to address threats to health and safety. Some communities may target such services to senior citizens to enable them to stay in an aging home that is otherwise safe or restrict the help to emergency situations. An extra \$1 billion was awarded for CDBG in early 2009 to accomplish expanded employment and economic benefit to the community, and a 10% increase over 2009 levels is built in the enacted 2010 budget.

The HOME Investment Partnerships Program (HOME) was created in 1990 (at 42 USC Part A) to help fulfill the national goal that every American family be able to afford a decent home in a suitable environment. Funds are to be used exclusively to support housing and activities community-based housing development capacity. The program pays for rental and homeownership activities, such as constructing new units, rehabilitating existing units, offering down-payment assistance, and providing tenant-based rental assistance, but Congress directed the program to prefer rehabilitation of existing housing. Because the units affected by the program must benefit people with low incomes and housing costs must remain affordable for a period of time, it is geared toward development of a group of homes within a development project rather than helping one renter or homeowner at a time. In addition, the unit must meet HUD's Housing Quality Standards (HQS) in every respect (and local codes) before it is cleared for occupancy. HOME dollars can be a resource in heavily Zone 1 communities in two ways: by the local grantee requiring mitigation in rehab projects, and by supporting a project focused on radon mitigation in multiple homes. However, since HOME funds must bring the entire home to HQS, accomplishing radon mitigation within a home that is otherwise in unfit condition is not a viable strategy. Funds are awarded to provide 60% of the resources to "participating jurisdictions" and 40% to states. The annual appropriation for HOME is \$2 billion.

The Neighborhood Stabilization Program (NSP), created by the Neighborhood Stabilization Act of 2008 and expanded by the American Recovery and Reinvestment Act of 2009, has been provided with nearly \$7 billion for short-term non-recurring investments to communities deeply affected by the mortgage foreclosure crisis in order to stabilize the housing market through 2010. Assistance amounts are proportional to the frequency of foreclosures. In addition to supporting acquisition, redevelopment and sale of foreclosed properties, the program supports housing rehabilitation so long as the resultant condition of the dwelling is compliant with applicable housing safety, quality and habitability codes, laws, regulations and other standards. The improvements may also contribute to energy conservation/efficiency. The program is operated by agencies that receive CDBG.

To check if assistance is available from these HUD programs:
(1) select your state and locality at <http://portal.hud.gov/portal/page/portal/HUD/states>,
(2) select the tab on the left "Learn about Homeownership," and
(3) scroll down to section marked "Home Repairs."
Note: some of the programs listed are funded by sources other than CDBG/HOME/NSP.

Federal Housing Administration and HUD Insured Loans

Title I Home Improvement Loans, created by Title I, Section 2, of the National Housing Act (12 U.S.C. 1703) and subject to regulations at 24 C.F.R. Part 201, is administered by the Home Mortgage Insurance Division of HUD's Office of Housing-Federal Housing Administration (FHA). \$57 million will be lent in 2010. The purpose of the program is to insure loans to finance light or moderate rehabilitation against risk of default. The program allows pre-qualified lenders to provide loans to cover permanent property improvements that protect or improve the basic livability or utility of the property for up to 20 years on single- and multifamily properties, up to \$25,000 for improving a single-family home and \$12,000 per unit for improving a multifamily structure, not to exceed a total of \$60,000 for the structure. Title I loans can be disbursed directly to the borrower or, if the loan is made through a contractor, the disbursement will be made jointly to the contractor and the borrower. While most lenders and dealers/contractors use this program responsibly, HUD urges consumers to use caution in choosing and supervising home repair dealers/contractors conducting Title I repair/renovation work, and offers advice at <http://nhl.gov/offices/hsg/sfh/title/sfixhs.cfm>.) The key advantage of a Title I loan for radon mitigation is that it is not bundled with a mortgage or dependent on borrower equity. Web page: <http://www.hud.gov/offices/hsg/sfh/title/title-i.cfm>

203(k) Loans, authorized by Section 203(k) of the National Housing Act of 1949 as amended by the Housing and Community Development Act of 1978 and subject to regulations at 24 C.F.R. 203.50 and 24 C.F.R. 203.440-494, provides mortgage loans to finance both acquisition and rehabilitation (or refinancing and rehab) in one transaction for property with 1-4 dwelling units that is older than one year, if rehab is needed to bring the property up to minimum standards, so long as the repairs cost at least \$5,000. To obtain a loan, the homebuyer/non-profit borrower applies to a participating lender with a cost estimate developed by a FHA- approved consultant that includes labor and materials. The total loan can equal the value of the property with the work completed (taking into account the cost of the work), but must be under limits posted at <https://entp.hud.gov/idapp/html/hicostlook.cfm>. Website: <http://www.hud.gov/offices/hsg/sfh/203k/203kabou.cfm>

Under the Streamlined 203(K) Program, the homebuyer/non-profit organization can borrow up to \$35,000 for property repairs or improvements without an estimate from a consultant, but must provide a written cost estimate and references from a duly licensed and bonded contractor(s) for each specialized repair or improvement. There is no minimum repair cost. If repairs exceed \$15,000, the borrower must obtain an inspection to certify that all repairs were completed. For more info, see www.hud.gov/offices/adm/hudclips/letters/mortgagee/files/05-50ml.doc

*To find a pre-qualified lender who offers Title I or 203(k) loans:
call (800) 225-5342 or select the option for Title I or 203(k) at
<http://www.hud.gov/ll/code/llslcrit.cfm>*

US Department of Agriculture Rural Development Housing Programs

The **Housing Repair and Rehabilitation Loans and Grants (Section 504) Program** provides repair and rehab loans up to \$20,000 to very low-income rural residents who own and occupy a dwelling in need of repairs to make the home more safe and sanitary or to remove health and safety hazards. The 1% interest loan must be repaid over a 20-year period. The homeowner-occupant must have very low income. A real estate mortgage and full title services are required for loans of \$7,500 or more. Those who meet the qualifications and also are 62 years old or older may receive \$7500 as a grant (in addition to a loan) in order to remove major health and safety hazards are removed and that all work meet local codes and standards; USDA may recapture a grant if the property is sold within 3 years. A grant/loan combination is possible up to \$27,500. The 504 program's web page is http://www.rurdev.usda.gov/rhs/sfh/brief_repairloan.htm

The **Direct and Guaranteed Loans for Rural Housing (Section 502) Program** provides households an opportunity to acquire, build, rehabilitate, or improve single family dwellings in rural areas. Federal funds total: \$130 million supports \$7.3 billion in loans for 59,000 homes. Authorized for US Department of Agriculture by Section 502 of the Housing Act of 1949. Regulations at 7 C.F.R. Part 3550 and HB1-3550 While the program provides basic mortgages, it can also support housing rehabilitation. Household income determines if applicants qualify for a loan directly from USDA Rural Development or from a financial institution. To obtain a Section 502 "direct" loan from USDA, a rural owner-occupant must have low or very low income. The standard term for a Section 502 loan is 33 years, although terms can vary. Loans are made at a fixed rate established by the Agency; payment subsidies are available to income-eligible borrowers to reduce loan payments. A real estate mortgage and full title services are required for loans of \$7,500 or more. The 502 Direct Loan program's web page is http://www.rurdev.usda.gov/rhs/sfh/brief_rhdirect.htm

A household with income too high to qualify for a Section 502 Direct loan may qualify for a Section 502 Guaranteed Housing Loan from a participating lender, such as banks or credit unions. USDA Rural Development issues a loan note guaranteed to the lender, which enables them to make loans to families that they would otherwise be unable to serve. These loans are made at a fixed rate of interest for 30 years and there is no limit on seller concessions. The lender may loan up to 102% of the appraised value; therefore, closing costs and repairs can often be included in the loan. Private mortgage insurance (PMI) is not required, but a small one time guaranteed fee is required at closing. The 502 Guaranteed Loan program's web page is http://www.rurdev.usda.gov/rhs/sfh/brief_rhguar.htm

The **Housing Preservation Grants (Section 533) Program** provides competitive grants to sponsoring organizations for the repair or rehabilitation individual housing, rental properties, or co-ops owned and/or occupied by very low- and low-income rural persons in areas where there is a concentration of need. Federal funds totaling \$27 million is authorized for US Department of Agriculture under Section 533 of the Housing Act of 1949; regulations are at 7 C.F.R. Part 3550 and HB1-3550. Housing Preservation Grant (HPG) assistance is available to assist very-low and low-income homeowners to repair and rehabilitate their homes, and to rental property

owners to repair and rehabilitate their units providing they agree to make such units available to very-low and low-income families. Financial assistance provided may include a grant, loan, or interest reduction on commercial loans. HPG funds received by a sponsor are combined with other programs or funds and used as loans, grants, or subsidies for recipient households based on a plan contained in the sponsor's application. Eligible sponsors include state agencies, units of local government, Native American tribes, and nonprofit organizations. The population limit of towns served is 20,000. The Housing Preservation Grant program's web page is http://www.rurdev.usda.gov/rhs/mfh/brief_mfh_hpg.htm

For all USDA housing programs, find the state office at <http://offices.sc.egov.usda.gov/locator/app?state=us&agency=rd>
Very low income is defined as below 50 percent of the area median income (AMI); low income is between 50 and 80 percent of AMI; moderate income is capped at \$5,500 above the low-income limit.

Mortgage Incentives to motivate cover loans for repair/rehab*

Community Reinvestment Act (CRA) is a federal law that mandates that banks meet the credit needs of low and moderate income neighborhoods, which is determined by the one of the four agencies responsible for the CRA: the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Office of Thrift Supervision (OTS). For 32 years, CRA has been the primary tool that community groups have used to increase the flow of private capital and expand access to banking services in low and moderate income communities and communities of color. Because passing CRA tests determines whether they will get approval to merge or add branches, financial institutions have a business motive to invest. One of the tests is whether the bank has provided community development loans, which include "loans for affordable housing rehabilitation and construction, including construction and permanent financing of multifamily rental property serving low- and moderate-income persons," and including "the abatement or remediation of, or other actions to correct, environmental hazards that are present in the housing." Test results are posted at <http://www.ffiec.gov/craratings/default.aspx>. Traditionally, CRA has worked because it provides citizens with the opportunity and standing to intervene on CRA exams and merger applications. While CRA agreements are hard to obtain, they still occur. Banks have CRA officers who are eager to finance affordable housing and community development, improve their CRA ratings and revitalize their local communities. Nonprofit community groups, counseling agencies and development agencies should regard banks as valuable resources and should present their ideas for supporting CRA eligible projects to bank CRA officers.

Housing Trust Funds

More than 600 **local and state housing trust funds** dedicate a specific tax or fee to the production and preservation of affordable housing. Such programs entailed a campaign to commit resources. Some funds are for special purposes and others are fairly generic, but they share an ongoing dedicated source of public funds to support the production and preservation of homes for low income households. Most housing trust funds are administered by a public or quasi-public agency. Most housing trust funds provide funding through loans and grants. Eligible activities are usually quite broadly defined, including new construction, rehabilitation, acquisition, emergency repairs, accessibility, first time homeownership and many other activities; programs have also incorporated requirements like including accessibility, mixed-income, green housing principles and housing-related services requirements. The most common revenue source for a city housing trust fund is impact fees placed on non-residential developers to offset the impact of their development's employees on the housing supply; these fees are part of the zoning ordinance. Other cities have committed condominium conversion fees or demolition fees, property taxes, real estate excise taxes, and hotel and motel taxes. The most common revenue source for a county housing trust fund is document recording fees; this is not only the best source for a county housing trust fund, it is also one of the few revenue sources that most counties can commit. Other sources used by counties, however, include sales taxes, developer fees, real estate transfer taxes or real estate excise taxes. The most common revenue source for a state housing trust fund is the real estate transfer tax, but states have committed nearly two dozen revenue sources to housing trust funds. Other options include interest from state held funds (such as unnamed unclaimed property funds and budget stabilization funds, among others), interest from real estate escrow or mortgage escrow accounts and document recording fees. For current information on housing trust funds and locations, see <http://www.communitychange.org/our-projects/htf>.

After many years of nationwide advocacy, the **National Housing Trust Fund** is close to becoming a reality. Initial plans call for the fund to be funded by a dedicated source such as unused funds from the Targeted Assets Relief Program. The National Housing Trust Fund was established as a provision of the Housing and Economic Recovery Act of 2008. The housing trust fund will, once capitalized, provide communities with funds to build, preserve, and rehabilitate rental homes that are affordable for extremely and very low income households. At least 90% of the funds must be used for the production, preservation, rehabilitation, or operation of rental housing, and up to 10% can be used for the following homeownership activities for first-time homebuyers: production, preservation, and rehabilitation; down payment assistance, closing cost assistance, and assistance for interest rate buy-downs. At least 75% of the funds for rental housing must benefit extremely low income households and all funds must benefit very low income households. An estimate of how much will be available and the benefits by state is at <http://www.nlihc.org/doc/NHTF-State-Estimates.pdf>

Financing for projects to repair multiple homes

The Low Income Housing Tax Credit (LIHTC) program is designed to expand the supply of affordable housing by encouraging private investment in such housing: investors provide cash or “equity” to the developer of a project and, in return, receive a dollar-for-dollar reduction in their federal income taxes. By reducing the amount of money a developer has to borrow, the development cost is lower and rents can be more affordable than they would be otherwise. The LIHTC can be used to support rehab of multifamily and single-family housing; it is not a viable source of financing for small-scale repair programs. Administered by the Internal Revenue Service (IRS), the LIHTC is a tax expenditure, which does not require an appropriation. It was created by the Tax Reform Act of 1986 and is codified at Section 42 of the Internal Revenue Code; regulations governing the program can be found at 26 C.F.R. 1.42. Tax credits are allocated to states based on their population, then states award the credits to projects based on criteria established in the state’s Qualified Allocation Plan (see Appendix 1). Both for profit and nonprofit developers can apply for credits; most investors are corporations. The LIHTC does not suffice for a project; it is combined with conventional mortgages, state loans, and other sources. Tax credits are only available for qualified low income housing projects that meet the formula in the law: generally, the greater the proportion of rent-restricted lower income units in a project, the more tax credits a project can receive, but it is possible for LIHTC projects to have a mix of units occupied by lower income people and moderate and middle income people. While rents on the tax credit units are restricted, the rent a tenant pays is not based on income but rather on the applicable area median income. Rental assistance subsidies are often needed to fill the gap between 30% of a resident’s actual income and the tax credit rent. To find a state program, see <http://www.ncsha.org/housing-help>.

The New Markets Tax Credit Program (NMTC), enacted in 2000 as part of the Community Renewal Tax Relief Act, is designed to stimulate investment and economic growth in low income urban neighborhoods and rural communities by offering a seven-year, 39% federal income tax credit for certain projects. The projects must have Qualified Equity Investments (QEI) that are made through investment Community Development Entities (CDE), which is a domestic corporation or partnership that has a primary mission of serving, or providing investment capital for, Low Income Communities or Low-Income Persons, maintains accountability to residents through their representation on its governing board or advisory board; and has been certified as a CDE by the Community Development Financial Institutions Fund of the US Department of the Treasury. The CDFI Fund accepts CDE Certification Applications on a rolling basis and issues NMTC Allocation Applications annually. CDEs use capital derived from the tax credits to make loans to or investments in businesses and projects in low income areas. Visit the CDFI website to review the list of CDE’s or obtain more information www.cdfifund.gov NMTC investments in low income communities total over \$7.7 billion; over 200 CDEs are using the NMTC to support a wide variety of community and economic development initiatives. Funded projects include a \$6 million effort to replace lead hazards in windows in Chicago homes; for information on how this project is structured, see www.chicagoleadsafe.com A report by the New

Markets Tax Credit Coalition, New Markets Tax Credits: Progress Report 2007, shows how CDEs continue to raise capital and deploy funds faster than required by law and regulation, and how they are targeting areas with poverty rates higher than 30%, incomes less than 60% of area or statewide median income, and unemployment greater than 1.5 times the national average, far beyond what is required by law. The CDFI Fund has made over 200 allocation awards which have been used to raise over \$7.7 billion in private equity investment targeted to low-income communities.

Rural Rental Housing Loans (Sections 515 and 538) are intended to increase the supply of affordable multifamily housing through partnerships with major lending sources , including State and local finance agencies and bond issuers. Federal funds total: \$20 million, which supports \$199 million in loans, authorized for US Department of Agriculture by Section 515 and 538 of the Housing Act of 1949. Regulations at 7 C.F.R. Part 3550 and HB1-3550. The program is limited to rural areas. Generally, communities are eligible if they have populations of not more than 10,000, nor more than 20,000 if there is a serious lack of mortgage credit. Individuals, partnerships, limited partnerships, for-profit corporations, nonprofit organizations, limited equity cooperatives, Native American tribes, and public agencies are eligible to apply. Borrowers must be unable to obtain credit elsewhere that will allow them to charge rents affordable to low- and moderate-income tenants. The housing must benefit tenants who are very low-, low-, and moderate-income families, elderly. and persons with disabilities. Households living in substandard housing are given first priority for tenancy. The Rental Housing Loan program's web page: http://www.rurdev.usda.gov/rhs/mfh/brief_mfh_rrh.htm

Appendix 1. Key Opportunities to Influence Funding Priorities

Consolidated Plans

HUD requires local and state agencies with block grants to submit a multi-year Consolidated Plan, based on requirements established in the Cranston-Gonzalez National Affordable Housing Act of 1990 and 1995 HUD regulations at 24 C.F.R. 91 for a planning process to determine housing needs and assign priorities to those needs. Agencies must submit a three-to five year plan describing housing needs, housing supply, and action plans that will govern the use of funds, and report on progress annually. The Strategic Plan must present the jurisdiction's specific objectives in measurable terms and estimate a timetable for achieving them. It must show a jurisdiction's priorities for distributing FUNDS among needs and various neighborhoods. "Needs" can mean type of activity (such as rental rehab) AND type of person (such as extremely low income). The Strategic Plan must explain why a category of need is a priority, especially among the income groups. In annual performance reports, the agency must report what it did to meet housing and community development needs, describe funds available and how they were spent, the location of projects, and the number of families and individuals assisted. The Plan must be amended if there are any changes in priorities, or in the purpose, location, scope or beneficiaries of an activity, or if money is used for an activity not mentioned in the Action Plan.

The submission of the plan to HUD must be preceded by a public hearing to receive input on housing and community development needs, publication of the proposed plan for public review, another public hearing about the proposed plan, an explanation of the reason why specific suggestions were not accepted. HUD can disapprove the final Plan for failure to follow public participation requirements; failure to satisfy all of the required elements; or, an inaccurate certification made by a jurisdiction (for example, failure of a jurisdiction to take appropriate actions to overcome impediments to fair housing). The annual performance report must be published and is also subject to public comments. If there is a change in the use of funds, public input is required. Also, the jurisdiction must have a written citizen participation plan available to the public that provides for and encourages public involvement in the Plan's creation and reviews of Annual Performance Reports and amendments, and encourage involvement by low income people, minorities, people who do not speak English, disabled people, and residents of public and assisted housing. For information on input, see the regulations 24CFR91 Subpart A on pages 6-12 at http://www.hud.gov/offices/cpd/about/conplan/finalrule_bookview.doc

The Consolidated Plan must also address lead-based paint issues after consultation between housing and health agencies, by reporting data for lead-based paint hazards and childhood lead poisonings, estimating the number of units occupied by low-income/ moderate-income families that have lead hazards, and describing planned actions to evaluate and reduce lead hazards, and certify compliance with HUD's lead safe housing rule. The requirement for tracking lead hazards and plans to address them could be replicated by a similar requirement for tracking homes with radon. Regardless, the Consolidated Plan process can be used to seek the

addition of radon mitigation specifically, or home repairs to address health and safety hazards, to priority activities and fund allocations.

Qualified Allocations Plans

The Qualified Allocation Plan (QAP) governs how a housing finance agency (HFA) awards its state's share of federal housing tax credits to housing projects according to adopted priorities and eligibility criteria. States use their discretion to emphasize important considerations such as target areas, priority populations, and leveraging. Increasingly, state agencies that control QAPs are adding emphasis on green design, by either requiring green standard compliance of all projects or by offering additional points in the competition for awards. The Green Communities program, an investment program to promote green building, calls for mitigation of radon in its design criteria; most states have adopted it or another program (see www.greencommunitiesonline.org/tools/policy/state_policy.asp). The QAP is subject to public hearing and comment requirements to convince the Housing Finance Agency to target (or better target) tax credits: for example, projects in zone 1 could be prioritized with the proviso that radon exposure be mitigated. Since the same agencies often control "balance of state" block grant funds and mortgage revenue bonds, convincing them to factor in radon can influence these other housing programs as well.

Appendix 2: Other Sources of Information

While the body of this report contains basic information about the key sources of financing for radon mitigation, other resources that can help communities to deliver related services or housing assistance are listed here.

- EPA-CDC-ATSDR have jointly published the “Federal Grants Guide for Community Environmental and Public Health Activities,” which is available for download from www.epa.gov/CARE/collaboration.htm
- The federal government operates the website www.grants.gov to provide current information about most funding programs available through federal agencies.
- “Building Blocks for Primary Prevention,” which was developed for CDC by the Alliance, contains a chapter with examples of programs to address lead hazards such as special real estate funding pool, revolving loan fund, fees on real estate transactions, local/state income tax credit, local/state property tax credit; many of these concepts are transferable to radon and other health hazards: <http://tinyurl.com/BBfunding>
- Refinancing a mortgage: <http://www.makinghomeaffordable.gov>
- Renting a home: <http://www.hud.gov/renting/local.cfm>
- Buying a home: http://portal.hud.gov/portal/page/portal/HUD/topics/buying_a_home
- Subsidy for rental housing to cover the gap between a household’s ability to pay and the fair market rent for a dwelling unit: While the Housing Choice Voucher Program is not a source of separate funds for financing for radon mitigation, it can be used to require mitigation in an existing rental property. Homes where vouchers are used must be in compliance with HUD’s Housing Quality Standards (HQS). The HQS standard for interior air quality, at 24 C.F.R. 982.401(h), requires that the dwelling unit be free of pollutants at levels that threaten the health of occupants , meaning “free from dangerous levels of air pollution from carbon monoxide, sewer gas, fuel gas, dust, and other harmful pollutants.” To locate the nearest voucher program, see <http://www.hud.gov/offices/pih/pha/contacts/index.cfm>

Acknowledgement: The Alliance drew material from the websites of HUD, FHA, USDA, FFIEC, the Center for Community Change, the Enterprise Community, and the National Low Income Housing Coalition for the material herein. Any errors in interpretation are solely the Alliance’s.