

Page	Section Title	PROPOSED AMENDMENTS TO SAINT PAUL HRA 2020 LOW INCOME HOUSING TAX CREDIT - QUALIFIED ALLOCATION PLAN (“QAP”)	Comment	Accept Yes/No
All	Housing Tax Credit QAP	Updates and clean up throughout the full document		
	Attachment 2: Saint Paul Selection Priorities and 9% Self-Scoring Worksheet	Minimum Thresholds <u>All Round 1 applicants must meet one of the following thresholds: (Check to indicate the threshold that the project is meeting)</u> <u>1. New construction or Substantial Rehabilitation in which, for the term of the extended use period (term of the Declaration), at least 75% of the total HTC units are single-room occupancy, efficiency, or one bedroom units with rents affordable to households whose income does not exceed 30 percent of the area median income (“AMI”);</u> <u>2. New construction or Substantial Rehabilitation family projects that are not restricted to persons who are 55 years of age or older and in which, for the term of the extended use period (term of the Declaration), at least 75% of the total HTC units contain two or more bedrooms and at least one-third of the 75% contain three or more bedrooms;</u> <u>3. Substantial Rehabilitation projects of existing housing in neighborhoods targeted by Minneapolis or Saint Paul for revitalization;</u> <u>4. Projects that are not restricted to persons of a particular group and in which, for the term of the extended use period (term of the declaration) a percentage of the units are set aside and rented to persons:</u> <u>a) With a serious and persistent mental illness as defined in Minnesota Statutes 245.462, Subdivision 20, paragraph (c)</u> <u>b) With a developmental disability as defined in United States Code, Title 42, Section 6001, paragraph 5</u> <u>c) Who have been assessed as drug dependent persons as defined in Minnesota Statutes 254A.02, Subdivision 5, and are receiving or will receive care and treatment services provided by an approved treatment program as defined in Minnesota Statutes 254A.02, Subdivision 2</u> <u>d) With a brain injury as defined in Minnesota Statutes 256B.093, Subdivision 4, paragraph (a); or</u> <u>e) With permanent physical disabilities that substantially limit major life activities, if at least 50% of the units in the project are accessible as provided under Minnesota Rules Chapter 1341</u> <u>5. Projects, whether or not restricted to persons of a particular age group, which preserve existing subsidized housing, if the allocation of HTC is necessary to: (a) prevent conversion to market rate use,</u>	To clearly define our objectives through the tax credit program, we are adding the minimum threshold criteria to remind applicants about our goals	

		<u>or (b) to remedy physical deterioration of the project, which would result in loss of existing federal subsidies.</u>		
	Attachment 2: Saint Paul Selection Priorities and 9% Self-Scoring Worksheet	A. Increase Supply for Those with the Lowest Incomes 1. Percentage of housing units serving households at or below 30% Area Median Income. <u>a. At least 20% of units (10 points)</u> <u>a-b. 10% to 19.9% 20% – 29.9% of units (6 point)</u> <u>b. 30% – 49.9% of units (7 points)</u> <u>c. 50% – 100% of units (8 points)</u>	Provide more clarity to projects with units at 30% AMI	
	Attachment 2: Saint Paul Selection Priorities and 9% Self-Scoring Worksheet	A. Increase Supply for Those with the Lowest Incomes 3. Homelessness. Up to five (5) <u>25</u> points will be awarded to new construction or substantial renovation projects that provide affordable housing with supportive services for occupancy by homeless households. <u>All projects claiming points must meet the following threshold requirements</u> <u>i. Minimum of four (4) units set aside for homeless persons to be referred exclusively through Ramsey Coordinated Entry System</u> <u>ii. Designated homeless units must be rent and income restricted at 30% AMI (with allowable project-based rent subsidy rents)</u> <u>iii. The applicant must provide satisfactory evidence in writing of a commitment from an appropriate social service agency to provide support services</u> <u>a) 4-9 homeless units (12 points)</u> <u>b) 10-19 homeless units (18 points)</u> <u>c) 20 homeless units or more (25 points)</u> <u>At least 10% of HTC units assist homeless residents (5 point)</u>	We are breaking down the number of homeless units and providing more points to projects with more homeless units	

Attachment 2: Saint Paul Selection Priorities and 9% Self-Scoring Worksheet		B. Preservation <i>The project ensures that the federal housing subsidy and low-income housing restrictions remain in place, preserving long-term affordability.</i> 1. Substantial Renovation. The project is a substantial renovation project that preserves low income housing which is defined as subsidized low income housing or non-subsidized housing developments with current rents at or below 50% area median income as determined by HUD if the use of tax credits is necessary to (1) prevent conversion to market-rate use; or (2) remedy physical deterioration of the project which deterioration would result in loss of affordable housing. <u>(10 points)</u> a. (15 points) — located inside a Qualified Census Tract b. (20 points) — located outside a Qualified Census Tract 2. Naturally Occurring Affordable Housing (NOAH) projects <u>Unsubsidized projects with the risk of rents going market rate and needing capital improvements may apply for funding if:</u> <u>a) At least 50% units remain affordable to tenants with income at 60% AMI or below (5 points)</u> <u>b) 100% units remain affordable to tenants with income at 60% AMI or below (10 points)</u>	We are removing the location based on the QCT and proposing to award 10 points to any rehabilitation project regardless of the location. We are also providing points to NOAH proposals (new criteria)	
Attachment 2: Saint Paul Selection Priorities and 9% Self-Scoring Worksheet		C. Healthy Communities, Wealth and Community Building 1. Enhanced Services, Programming, and Amenities. Up to eight points will be awarded to projects that provide new or enhanced resident services. Receipt of points are contingent upon an agreement with an established local organization to provide such services to residents and evidence demonstrating financial feasibility which includes payment for those services. <u>Services are to be provided to tenants for free</u> (Up to 78 points) a. After-school programming and/or ECFE (1 point) b. Information and Referral Services (1 point) c. Playground Equipment (1 point) d. Community Center or Community Room (1 point) e. Financial capability programming* i.e Financial literacy, financial counseling and coaching, debt counseling or management planning, <u>tax preparation</u>, and access to safe and affordable financial products through partnership with local organizations such as Neighborhood Development Alliance (NeDA), Lutheran Social Services Credit Building Loan, Neighborworks Home Partners, Model	We are combining financial programming and tax services to make it less confusing to applicants. We are also clarifying that services are to be provided free of charge to tenants.	

		Cities Financial Literacy Program, Prepare + Prosper FAIR Initiative and financial inclusion, among others (1 point) f. Homeownership readiness* i.e matched savings accounts for down payments [and/or] pre-purchase homeownership counseling or coaching through a HUD-approved housing counseling agency, a member of the Minnesota Homeownership Center’s Homeownership Advisors Network, or a Minnesota Housing Finance Agency Homeownership Capacity provider. (1 point) g. Financial and tax services* mentoring tenants for Credit builder Loans, Free Tax Preparation and other financial services through a partnership with local organizations such as Neighborhood Development Alliance (NeDA), Lutheran Social Services Credit Building Loan, NeighborWorks Home Partners, Model Cities Financial Literacy Program, Prepare + Prosper, among others (1 point) h.g. Other (Please describe) _____ (1 point) *At least a two of these services must be included to claim more than 4 points		
	Attachment 2: Saint Paul Selection Priorities and 9% Self-Scoring Worksheet	D. Fair Access to Housing: 2. Transit. Points will be awarded to new construction or substantial rehabilitation projects that are: a. Located within 0.25 miles of a completed or planned* light rail train (“LRT”) station and bus rapid transit or other fixed transitways stops (3 points) b. Located within 0.25 miles of a high service Metro Transit bus route (defined as a bus running at least every 30 minutes). (2 points) *Note: Includes planned stations on future transitways that are in advanced design or under construction. To be considered in advanced design, transitways need to meet the following criteria: issuance of a draft EIS, station area planning underway, and adoption by the Metropolitan Council Transportation Policy Plan. <u>Applicant can only claim 3 or 2 points, not both.</u>	Clarify that applicants can only claim 2 or 3 points in this section	
	Attachment 2: Saint Paul Selection Priorities and 9% Self-Scoring Worksheet	D. Fair Access to Housing: 4. Tenant Selection Plans. Project that has a rental deposit that does not exceed more than one month rent (1 point) <u>Up to three (3 points) will be awarded to applicants who submit a plan to protect tenants and remove barriers that exclude or limit housing access for tenants because of their rental of criminal background. A written policy must be provided.</u>	Clarify that applicant can only work with a property management with a history of supporting evictions based on “just cause” and requiring a written tenant selection plan policy	

		a. Credit Rental History: Projects will not deny rental applications based solely on previous rental history and credit history; b. <u>Just cause eviction: property management has a history of supporting evictions solely based on “just cause”. The City has a full list of qualifying reasons for just cause here: Rules and Processes (2023) Saint Paul Minnesota (stpaul.gov)</u> c. <u>Background: Property management has a history and a policy that does not restrict access to housing based on criminal background</u> (2 points)		
	Attachment 2: Saint Paul Selection Priorities and 9% Self-Scoring Worksheet	D. Fair Access to Housing: 6. New Affordable Family Housing. The project constitutes new construction of affordable family housing (as defined in Threshold Criteria #2) that is located _____ outside a Qualified Census Tract: _____ (12 points) _____ inside a Qualified Census Tract: _____ (9 points)	We are proposing to remove this criterion for new construction projects based on the QCT location	
	Attachment 2: Saint Paul Selection Priorities and 9% Self-Scoring Worksheet	E. CATALYTIC DEVELOPMENT SITES <i>Demonstration that the project attracts and increases private and other public investments in the area.</i> HRA Land or HRA/City Debt Obligation. Ten (10) points will be awarded to new construction or Substantial Rehabilitation projects that are located on HRA-owned land or have a HRA/City debt obligation. (10 points) a. <u>The project, new construction, adaptive reuse, or preservation is located on Saint Paul HRA-owned land (5 points)</u> b. <u>The project has a HRA/City debt obligation. (5 points)</u>	Clarify the points breakdown for this section.	

	Attachment 2: Saint Paul Selection Priorities and 9% Self-Scoring Worksheet	F. Innovative Approach and Financial Considerations 1. No Further Subsidy. Five (5) points will be awarded to projects which are fully funded with the inclusion of the 9% HTC and/or will require no further HRA subsidy, except DEED or Metropolitan Council funds, if awarded 9% HTC. <u>Projects that have received any prior commitment for gap subsidy from the City or HRA should not claim these points</u> (5 points) 2. Intermediary Costs (soft costs). Points will be awarded to projects on a sliding scale of intermediary costs based on percentage of total project costs. For those projects which are awarded points in this category, this percentage will<u>may</u> be enforced at issuance of IRS Form 8609. <u>a. 15% or below</u> (4 points) a.b. 15.1% – 20% of total project cost (3 points) b.c. 20.1% – 25% of total project cost (2 points) <u>d.</u> 25.1% - 30% of total project cost (1 point) e.c. <u>30.1% or higher</u> (0 points)	Clarify who should receive points for the No Further Subsidy section and providing more points to projects with soft costs below 15%	
	Attachment 2: Saint Paul Selection Priorities and 9% Self-Scoring Worksheet	1. Long Term Affordability. By applying for the 9% HTC, the owner agrees that the provisions of Section 42(h)(6)(E)(i)(ii) and Section 42(h)(6)(F) of the Code (which provision would permit the owner to terminate the restrictions under this agreement at the end of the compliance period in the event the Saint Paul HRA does not present the owner with a qualified contract for the acquisition of the project) do not apply to the project, and the owner also agrees the Section 42 income and rental restrictions must apply for a period of 30 years beginning with the first day of the compliance period in which the building is a part of a qualified low income housing project. The owner agrees to extend the long-term affordability of the project by agreeing to extend the term of the LURA beyond 30 years by choosing an option below. a. The owner agrees to extend the long-term affordability of the project and maintain the duration of low-income use for a minimum of 40 years. (5 points) b. The owner agrees to extend the long term affordability of the project and maintain the duration of low income use for a minimum of 45 years. (6 points) e.b. The owner agrees to extend the long-term affordability of the project and maintain the duration of low-income use for a minimum of 50 years. (7 points) Intermediary Costs (soft costs):	Removing the 2 nd tier in this section	

	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	<u>Selection Criteria:</u> <u>Projects submitting an Application to the Saint Paul HRA for tax-exempt housing revenue bonds must demonstrate that the project will score a minimum of 40 points under the 4% HTC Selection Criteria below.</u> <u>The request for bond financing must not exceed the HRA’s bonding capacity for that given year and applicants should consider phasing their project for additional allocation.</u>	Clarify that the request for bonds cannot exceed the HRA bonding capacity	
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	1. NO FURTHER SUBSIDY/FINANCING COMMITTED Up to fifteen (15) points will be awarded to projects that require no gap financing or have secured funding commitments from more than one funding source other than the Saint Paul HRA sources at the time of application. Sources must be documented with the amount, terms and conditions in writing from the designated contributor. Words synonymous with “consider” or “may” award are not valid or acceptable. <u>Gap financing includes any source of funding other than the first mortgage bond financing and tax credit equity. Applicant must provide supporting materials for committed sources such as commitment letters, letters of intention, resolutions, or other relevant documentation.</u> <u>Applicants may include anticipated utility or sales tax rebates as a funding source. A letter from the developer committing these funds as a capital contribution to the project must be submitted with the Application to consider the source as committed.</u> a) No gap financing or 15.1% or more of funding committed. (15 points) b) 10.1-15% of funding committed. (7 points) c) 5% -10% of funding committed. (3 points)	Clarify what is included in “gap financing”	

	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	2. LONG TERM AFFORDABILITY Only Applications seeking 4% HTC for use in conjunction with tax exempt bonds are eligible to claim points through this priority. By applying for the 4% HTC, the owner agrees that the provisions of Section 42(h)(6)(E)(i)(ii) and Section 42(h)(6)(F) of the Code (which provision would permit the owner to terminate the restrictions under this agreement at the end of the compliance period in the event the Saint Paul HRA does not present the owner with a qualified contract for the acquisition of the project) do not apply to the project, and the owner also agrees the Section 42 income and rental restrictions must apply for a period of 30 years beginning with the first day of the compliance period in which the building is a part of a qualified low income housing project. The owner agrees to extend the long-term affordability of the project by agreeing to extend the term of the LURA beyond 30 years by choosing an option below. a) The owner agrees to extend the long-term affordability of the project and maintain the duration of low-income use for a minimum of 40 years (15 points) b) The owner agrees to extend the long-term affordability of the project and maintain the duration of low-income use for a minimum of 45 years (17 points) c)<u>b)</u> The owner agrees to extend the long-term affordability of the project and maintain the duration of low-income use for a minimum of 50 years (20 points)	Removing the 2 nd tier													
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	3. INTERMEDIARY COSTS (SOFT COSTS) Points will be given to projects on a sliding scale of intermediary costs based on percentage of total project costs. For selected projects, this percentage will be enforced at issuance of IRS Form 8609 <table><tr><th>% of Total Project Cost</th><th>Points Awarded</th></tr><tr><td>15% or below</td><td>4</td></tr><tr><td>15.1 - 20%</td><td>3</td></tr><tr><td>20.1-25%</td><td>2</td></tr><tr><td>25.1-30%</td><td>1</td></tr><tr><td>30.1% and higher</td><td>0</td></tr></table> (1-3 points)	% of Total Project Cost	Points Awarded	15% or below	4	15.1 - 20%	3	20.1-25%	2	25.1-30%	1	30.1% and higher	0	Provide points to projects with soft costs below 15%	
% of Total Project Cost	Points Awarded															
15% or below	4															
15.1 - 20%	3															
20.1-25%	2															
25.1-30%	1															
30.1% and higher	0															

	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	1. LARGER-SIZED FAMILY HOUSING The project provides units for large families of project units containing 3 or more bedrooms <u>affordable at 60% AMI or below.</u> <table><tr><th>% of Units –3BR or larger</th><th>Points Awarded</th></tr><tr><td><u>At least 15% of units</u></td><td><u>2</u></td></tr><tr><td>At least 3025% of units</td><td>53</td></tr><tr><td><u>At least 50% of units</u></td><td><u>6</u></td></tr></table> (3 or 6 points)	% of Units –3BR or larger	Points Awarded	<u>At least 15% of units</u>	<u>2</u>	At least 30 25% of units	5 3	<u>At least 50% of units</u>	<u>6</u>	Clarifying the affordability level and lowering the threshold for large size units to encourage the production of more family-size units	
% of Units –3BR or larger	Points Awarded											
<u>At least 15% of units</u>	<u>2</u>											
At least 30 25% of units	5 3											
<u>At least 50% of units</u>	<u>6</u>											
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	5. PRESERVATION <u>The project preserves long-term affordability in projects with existing federal or local funds, that are at a risk of loss within 5 years. (10 points)</u> 6. NATURALLY OCCURRING AFFORDABLE HOUSING (NOAH) PROJECTS <u>Unsubsidized projects with the risk of rents going market rate and needing capital improvements may apply for funding if:</u> a) <u>At least 50% units remain affordable to tenants with income at 60% AMI of below (5 points)</u> b) <u>100% units remain affordable to tenants with income at 60% AMI or below (10 points)</u>	Add criteria for preservation and NOAH projects									
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	3. SAINT PAUL HRA LAND AND DEBT OBLIGATION a) <u>The project, new construction, adaptive reuse or preservation or substantial renovation is located on Saint Paul HRA-owned land. Applicant must provide an HRA Board resolution granting them the tentative developer status or (10 points)</u> b) <u>The project has a HRA/City debt obligation (10 points)</u>	Clarify the difference between projects on HRA land and projects with a HRA debt obligation									
	Attachment 4 Saint Paul Selection	6. NEW AFFORDABLE FAMILY HOUSING The project constitutes new construction of affordable family housing that is located: Outside a Qualified Census Tract 12 points Inside a Qualified Census Tract 9 points	We are proposing to remove this criteria for new construction projects based on the QCT location									

	Priorities and 4% Self-Scoring Worksheet	{12 or 9 points}		
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	1. PERCENTAGE OF HOUSING UNITS SERVING HOUSEHOLDS AT OR BELOW 50% AREA MEDIAN INCOME % of HTC Units at 50% AMI or below/Total Units Points Awarded 50% - 59.9% of units1 60% - 74.9% of units3 75% - 100% of units6 (1, 3, 6 points)	Clarify that this section is for the percentage of units at 50% AMI or below	
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	10. PERCENTAGE OF HOUSING UNITS SERVING HOUSEHOLDS AT OR BELOW 30% AREA MEDIAN INCOME Percentage of housing units serving households at or below 30% Area Median Income. At least 20%—29.9% of units 6-10 <u>10% to 19.9% of units</u> <u>6</u> 30%—49.9% of units 7 50%—100% of units 8 {6, 7, 8 points}	Provide more clarity to projects with units at 30% AMI (to be consistent with the 9% scorecard)	
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	11. Homelessness. Up to (five) 5-25 points will be awarded to new construction or substantial renovation projects that provide affordable housing with supportive services for occupancy by homeless households. <u>All projects claiming points must meet the following threshold requirements</u> <u>iv. Minimum of four (4) units set aside for homeless persons to be referred exclusively through Ramsey Coordinated Entry System</u> <u>v. Designated homeless units must be rent and income restricted at 30% AMI (with allowable project-based rent subsidy rents)</u> <u>vi. The applicant must provide satisfactory evidence in writing of a commitment from an appropriate social service agency to provide support services</u> <u>d) 4-9 homeless units (12 points)</u> <u>e) 10-19 homeless units (18 points)</u> <u>f) 20 homeless units or more (25 points)</u> <u>At least 10% of HTC units assist homeless households</u>	We are breaking down the number of homeless units and providing more points to projects with more homeless units (to be consistent with the 9% scorecard)	

	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	1. NON-SMOKING POLICY <u>The project will institute and maintain a written policy prohibiting smoking in all units and all common areas within the building(s) of the project. The written policy, submitted after selection during the due diligence process, must include procedures regarding transitioning to smoke free for existing residents and establishment of smoking areas outside of units and common areas, if applicable. Consequences for violating the smoke free policy are determined by the owner but must be included in the written policy. The project must include a non-smoking clause in the lease for every household. Projects awarded a point in this scoring criteria may be required to maintain the smoke free policy for the term of the LURA (1 point)”. </u>	New Criteria for 4% (consistent with the 9% scorecard)	
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	14. ENHANCED SERVICES, PROGRAMMING AND AMENITIES Up to 78 points awarded to projects that provide new or enhanced resident services. Receipt of points are contingent upon an agreement with established local org to provide such services to residents and evidence demonstrating financial feasibility which includes payment for those services. * designates that at least two of these services must be included to claim more than 4 points. Each category listed below is worth 1 point: a) After-school programming and/or ECFE b) Info and Referral Services c) Playground Equipment d) Community Center or Community Room e) Financial capability programming* i.e., Financial literacy, financial counseling and coaching, debt counseling or management planning, <u>tax preparation</u>,and access to safe and affordable financial products through partnership with local organizations such as Neighborhood Development Alliance (NeDa), Lutheran Social Services Credit Building Loan, Neighborworks Home Partners, Model Cities Financial Literacy Program, Prepare + Prosper FAIR Initiative and financial inclusion, among others f) Homeownership readiness* i.e. matches savings accounts for down payments [and/or] pre-purchase homeownership counseling or coaching through a HUD-approved counseling agency, a member of the Minnesota Homeownership Center’s Homeownership Advisors Network, or a Minnesota Housing Finance Agency Homeownership Capacity provider. g) Financial and tax services* mentoring tenants for Credit build Loans, Free Tax Preparation and other financial services through a partnership with local organizations such as Neighborhood Development Alliance (NeDa),	We are combining financial programming and tax services to make it less confusing to applicants. We are also clarifying that services are to be provided free of charge to tenants.	

		Lutheran Social Services Credit Building Loan, NeighborWorks Home Partners, Model Cities Financial Literacy Program, Prepare + Prosper, among others h)g) Other (Please Describe) *At least two of these services must be included to claim more than 4 points.		
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	3-4. TENANT SELECTION PLAN. Up to four points awarded. Project that has a rental deposit that does not exceed more than one month’s rent. (1 point) Up to three (3 points) will be awarded to applicants who submit a plan to protect tenants and remove barriers that exclude or limit housing access for tenants because of their rental of criminal background. A written policy must be provided. a) Credit Rental History: Projects will not deny rental applications based solely on previous rental history (3 points) b) Just cause eviction: Property management has a history and a policy of supporting evictions solely based on “just cause”. The City has a full list of qualifying reasons for just cause here: Rules and Processes (2023) Saint Paul Minnesota (stpaul.gov) c) Background: Property management has a history and a policy that does not restrict access to housing based on criminal background	Clarifying that applicant can only work with a property management with a history of supporting evictions based on “just cause” and requiring a written tenant selection plan policy	
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	Equity and Cultural Integration. Up to 10 points will be awarded to projects that demonstrate the use of strategic and integrated approach to addressing equity issues and the intended impacts of the project will result in tangible and measurable equitable outcomes	New criterion	
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	Senior Housing: Five (5) points will be awarded to projects that meet HTC threshold number 1 and serve only residents 55 years old or older. (5 points)	New criterion	

	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	Historic Building. One point (1) will be awarded to projects that are completing a certified rehabilitation that conforms with the Secretary of Interior’s Standards for Rehabilitation of a certified historic property and is listed, either individually or as part of a district, on the National or State Historic Register; or the State Historic Preservation Office expects to be listed on the National or State Historic Register.	New criterion	
	Attachment 4 Saint Paul Selection Priorities and 4% Self-Scoring Worksheet	Project-based Section 8. Up to five (5) points will be awarded to projects that are a Substantial Rehabilitation project that preserves existing project-based Section 8 assistance. a. 0% - 25% of units are PBA Section 8 (1 point) b. 25.1% - 50% of units are PBA Section 8 (3 points) c. 50.1% - 100% of units are PBA Section 8 (5 points)	New criterion	