

New Markets Tax Credit Coalition

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The New Markets Tax Credit (NMTC) Coalition is a national membership organization that advocates on behalf of the NMTC program. The Coalition, which now includes more than 150 members, is managed by Rapoza Associates, a public interest lobbying, policy analysis and government relations firm located in Washington, DC. Paul Anderson is the principal author of this report.

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Wells Fargo Community Lending and Investment San Diego, CA

NEW MARKETS TAX CREDIT Progress Report 2015



Acknowledgements

The following provided generous financial support for this publication:

Chase

Baker Tilly Virchow Krause, LLP

Bank of America

Butler Snow LLP

Capital One

Dentons

Husch Blackwell LLP

Kutak Rock LLP

Leverage Law Group, LLC

National Cooperative Bank

Nixon Peabody, LLP

SunTrust Community Capital LLC

The following entities and individuals provided generous amounts of their time and talent to assist in the development of this report:

Traci Vaine and Aimee Cates of CEI Capital Management LLC

David Trevisani, Adam Ennis, Daniel Choi, and Edi Friedlander of the National Development Council Kermit Billups and Randy Kahn of Greenline Ventures

ampersand graphic design, Boulder, CO, provided valuable assistance in the preparation of this report.

Cover Photo Credits

Thank you to the following entities for cover photos: Atlanta Emerging Markets, Inc. (Southside Regional Medical Center, a federally qualified health center), Central Bank of Kansas City (Bissingers, a St. Louis, MO manufacturer), and Florida Community Loan Fund (CASA, a 100 bed domestic violence shelter in St. Petersburg, FL).

COMMUNITY DEVELOPMENT ENTITY (CDE) SURVEY OF 2014 NMTC ACTIVITY: BY THE NUMBERS

Every year, the NMTC Coalition sends a survey to all CDEs that have received a NMTC allocation. The survey requests information on each CDE's NMTC activity in the previous calendar year. The Coalition's most recent survey of CDEs covered NMTC activity in the 2014 calendar year. The following findings bolster the case that the NMTC continues to serve as an effective tool for driving capital to areas of economic distress:

* * * * *

Representing \$16.8 billion in total allocation, 67 CDEs responded to the survey and reported on their 2014 NMTC activity. Those respondents reported:

- **\$1.4 billion** in Qualified Equity Investments;
- ▶ \$1.5 Billion in Qualified Low Income Community Investments;
- \$3.8 billion in total project financing;
- 239 businesses receiving NMTC financing;
- ▶ 71% of NMTC investments were made in severely distressed communities;
- ▶ **51%** of NMTC investments were made in communities with unemployment rates at least 1.5 times the national average;
- ▶ **39,378** total jobs created by projects closing in 2014, including:
 - △ **20,019** full-time jobs; and
 - △ **19,359** construction jobs;
- **\$3.5 billion** in projects in the pipeline for 2015.

All this adds up to:

Billions of dollars in private investment in businesses, at a modest cost to the government; the creation of thousands of construction and permanent jobs; financing for credit-starved, small- and medium-sized businesses and revitalization efforts in the nation's most distressed urban and rural communities.

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INTRODUCTION

The Coalition's eleventh annual New Markets Tax Credit (NMTC) *Progress Report* is designed to inform policymakers and practitioners on how the NMTC works and to document the latest trends and successes of the NMTC in contributing to the revitalization of urban and rural communities across America.

The report highlights findings from the Coalition's annual survey of Community Development Entities (CDEs) with NMTC allocations. The survey collected data from CDEs raising capital and making loans and investments in 2014 using the NMTC.

Our findings show the NMTC continues to serve as an effective incentive for community renewal. Reported jobs numbers reinforce recent job creation analysis by the United States Department of the Treasury's Community Development Financial Institutions (CDFI) Fund, as well as the findings of the Coalition's 2014 Economic Impact Report, which analyzed data from 2003 and 2012.

The 2015 NMTC *Progress Report* was prepared for the New Markets Tax Credit Coalition, a national membership organization of CDEs and investors organized to advocate on behalf of the NMTC.



Constructed circa 1910, this historic north St. Louis building was once home to the Missouri Kansas Texas Railroad Depot. The NMTC helped finance a \$15 million renovation, and the restored building will serve as the headquarters for a chocolate manufacturer. Image from Central Bank of Kansas City.

ABOUT THE NEW MARKETS TAX CREDIT

History and Purpose

In December 2000, the Community Renewal Tax Relief Act (P.L. 106-554) was signed into law. This legislation authorized the New Markets Tax Credit (NMTC) program, a modest tax incentive designed to increase the flow of private sector capital to communities long overlooked by conventional lenders. Since that time, the NMTC has become an essential tool for the revitalization of communities left out of the economic mainstream, delivering an unprecedented level of private sector capital to underserved urban neighborhoods and small-town and farming communities.

Then – just as it is now – the basis for the Credit is that business success depends on access to capital. There are attractive investment opportunities in low income communities, but the cost and availability of capital in these 'New Markets' is an impediment to economic growth. A 1990 study by HUD¹ highlighted two main gaps – capital and information – which hold back the growth of inner city economies. Investors and firms often lack sufficient data to assess property value or consumer demand in low income communities, where informal economies distort data. The capital gap deprives inner city businesses of the investment dollars they need to set up shop and expand. As a result, low income communities are under-retailed as inner city residents leave their neighborhoods to shop. These communities lack the capital to construct or renovate community facilities or revitalize industrial and commercial facilities that would create jobs, economic opportunity and improve the quality of life. The NMTC bridges the capital gap, by easing the flow of capital into

these areas, connecting investors with new opportunities in communities in which they had previously not considered.

INSIDE: SPECIAL REPORT

After three decades of steep cuts in federal community development, the NMTC is one of the only federal tools available to help persistently disinvested communities create jobs, improve services, and break out of the cycle of poverty.

Learn more in our SPECIAL REPORT:

The NMTC and Federal Economic

Development (page 26).

More than a decade later, there is substantial evidence that low and moderate income areas continue to be underserved by private sector capital. A 2011 study by the Initiative for a Competitive Inner City found that "firms in low income census tracts received 21 percent fewer loans than would be expected, based on the number of firms in the tracts," even with a healthy demand for capital and an untapped consumer base². This lack of capital stifles entrepreneurs and impedes growth, allowing urban decay and economic stagnation to persist in downtown areas and small towns, despite opportunities for investment.

To address this capital gap, Congress established the NMTC. To date, Congress has authorized some \$43.5 billion in NMTCs.

¹ Retail Buying Power and Sales Gaps in Inner-City New Markets, Department of Housing and Urban Development, 1999.

² Capital Availability in Inner Cities: What Role for Federal Policy? 2011.

Legislative History

- ▶ \$15 billion was made available for 2001-2007 in the Community Renewal and Tax Relief Act of 2000 (P.L. 106–554);
- An additional \$1 billion was authorized for communities hard-hit by Gulf Coast hurricanes in the Gulf Opportunity Zone Act of 2005 (P.L. 109-135);
- In 2006, Congress extended the NMTC for 2008 at \$3.5 billion in annual credit authority through the Tax Relief and Health Care Act of 2006 (P.L. 109-432);
- ➤ The Emergency Economic Stabilization Act of 2008 (P.L. 110-343) extended the Credit for 2009, again at \$3.5 billion in annual credit authority;
- ► The American Recovery and Reinvestment Act of 2009 (P.L. 111-16), increased annual credit authority to \$5 billion for both 2008 and 2009;
- ➤ The Tax Relief, Unemployment Insurance Reauthorization and Job Creation Act of 2010 (P.L. 111-312) provided a two-year extension of the NMTC (2010 and 2011) with annual credit authority of \$3.5 billion;
- ➤ The American Taxpayer Relief Act of 2012 (P.L. 112–240) provided a two-year extension of the NMTC (2012 and 2013) with annual credit authority of \$3.5 billion; and
- ➤ The Tax Increase Prevention Act of 2014 (P.L. 113-295) extended the NMTC for 2014 at \$3.5 billion in annual credit authority.

The NMTC expired on December 31, 2014, and, as this report goes to press, Congress is in the process of debating tax reform and extension of the NMTC and other expired business tax extenders. This winter, bipartisan extension legislation – *The New Markets Tax Credit Extension Act of 2015* – was introduced by Senators Roy Blunt (R-MO) and

Chuck Schumer (D-NY) in the Senate (S. 591) and Representatives Pat Tiberi (R-OH), Richard Neal (D-MA), and Tom Reed (R-NY) introduced a companion bill the House (H.R. 855). The legislation provides a permanent authorization for the NMTC, increases annual credit authority in 2015 and with inflation adjustments in future years, and exempts NMTC investments from the Alternative Minimum Tax (AMT). The proposal is n line with the Obama Administration's Fiscal Year 2016 tax proposals.

Leaders of NMTC Extension Legislation in the Senate (S. 591)

SENATOR ROY BLUNT (R-MO)

"The New Markets Tax Credit Program has a history of success in Missouri, leading to billions of dollars in investments and thousands of jobs in rural and urban



communities around the state. I'm pleased to join my colleagues to introduce this bipartisan bill and make this tax credit permanent so that we can continue to encourage investment, job creation, and economic growth in low-income communities in Missouri and nationwide."

SENATOR CHUCK SCHUMER (D-NY)

"The [NMTC] program has provided over \$6 billion in total project financing to our state, creating nearly 50,000 construction jobs and 20,000 full-time jobs over the last ten years. Development projects, like Roswell's new Clinical Sciences Center in Buffalo

- a \$42 million project that will add additional chemotherapy treatment chairs, additional breast cancer screening and treatment space, and new cancer research and clinical space."

Leaders of NMTC Extension Legislation in the House (H.R. 855)

REP. PAT TIBERI (R-OH)



"I've seen first-hand the benefits of the New Markets Tax Credit in the 12th Congressional District. This tax credit is a tool to help revitalize communities by not only putting people to work but by funding projects that are a community benefit."

REP. RICHARD NEAL (D-MA)

"Since its inception in 2000, the New Markets Tax Credit has shown that it is a federal program that works—spurring investment that that grows local economies and generates jobs in the most distressed communities across the nation."



REP. TOM REED (R-NY)



"The New Markets Tax Credit is a powerful tool to bring rebirth in our communities. Here in the Southern Tier and Finger Lakes, a YMCA brought needed jobs to a rural community hard-hit by unemployment."

How the NMTC Works

The New Markets Tax Credit is a place-based gap financing tool designed to revitalize low income communities. Unlike programs that subsidize a specific economic activity, such as the creation of affordable housing, the NMTC is designed to deliver capital to narrowly defined geographic locations: underserved census tracts that meet specific criteria of economic distress.

In order to deliver capital to these underserved "new markets." the NMTC authorizing statute created a new category of investment intermediary, Community Development Entities (CDEs).3 A CDE must be a domestic corporation, have a demonstrated mission of serving or providing capital to low income communities or people, and maintain accountability to residents of low income communities through representation on a governing or advisory board to the CDE. Most CDEs are affiliates of mission-driven organizations, for-profit entities, government entities, or private financial institutions.

CDEs must be certified by the Community
Development Financial Institutions (CDFI) Fund of
the Treasury, the administering agency for the
NMTC. Once certified, a CDE may apply to the CDFI
Fund for NMTC allocation.



Learn more about how the NTMC works...

Applications for allocation are scored by the CDFI Fund in four areas: community impact, business strategy, capitalization strategy, and management capacity. Throughout the history of the NMTC, demand for credits has exceeded the authorized amount by eight to one. The success rate of applications for Credits is less than 25 percent.

³ Note: The 2015 Progress Report is based on a survey of CDEs.

When a CDE wins an allocation, it raises private investments and then deploys those investments to projects and businesses in low income communities. In return for an equity investment in a CDE, a private investor – typically a private financial institution – receives a 39 percent credit against federal taxes spread over seven years.

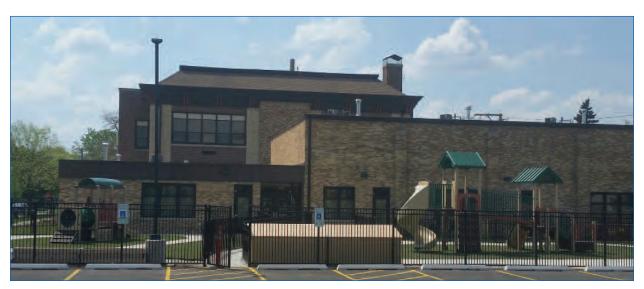
The CDE uses that capital to make loans or investments in businesses in low income communities. NMTC-financed loans tend to include below market interest rates and non-traditional features unavailable through conventional financing.

"Substantially all" of a CDE's investments (85 percent) must be targeted to the low income service area identified by the CDE, but there is significant flexibility in the types of businesses and development activities that NMTC investments can support – including community facilities like childcare or healthcare facilities and charter schools, manufacturing facilities, equipment or facilities for nonprofit businesses, and homeownership projects. Specific examples of businesses financed by the NMTC in 2014 include a chocolate manufacturer, manufacturer of biofuels, community health center, high-tech research facility, daycare center, grocery store, and worker training facility.



The NMTC financed the expansion of a family-owned engine manufacturer in Grand Rapids, Michigan, creating an estimated 39 new living-wage jobs within 5 years and reducing the environmental impact of the manufacturing process. Image from CEI Capital Management.

The NMTC "but-for" test limits the amount of NMTC-generated financing necessary for financial feasibility. The NMTC typically provides "last-in" gap financing, meaning it is the last financing secured to make a project viable. CDEs and investors evaluate the sources and uses of available capital, the business plan of the enterprise in question, and its impact on the low income community in order to



NMTC financing helped construct the Joliet Early Learning Center, a state of the art early learning program serving children 6 weeks to 12 years old from low income families in the Joliet, Illinois community. Photo by Lyle Haerle via Southside Optimal Redevelopment Advisors.

determine how much NMTC financing is needed to complete the project and maximize community impact.

If additional subsidies are not needed, the project will not receive NMTC financing. Only after all the financing from other sources is committed, and the impact is clear, does a CDE commit to providing NMTC financing.

OVERSIGHT

The CDFI Fund (within the Treasury Department) administers CDE certification and the allocation of NMTCs, as well as monitors CDE compliance once Credits are awarded. The Internal Revenue Service (IRS) is responsible for issuing guidance on NMTC investments and monitoring taxpayer compliance.

Strong Demand for NMTC Allocation Fuels Competition and Efficiency

Community Development Entities (CDEs')

demand for the NMTC continues to far outstrip NMTC availability. CDEs requested \$281 billion in allocation authority between 2003 and 2014 while the CDFI Fund has awarded NMTC allocation authority totaling \$40.1 billion, with an additional \$3.5 billion awarded shortly after this publication goes to print. Allocation demand is more than seven times availability.

In recent years, in light of the keen competition for Credits, the CDFI Fund has modified the allocation application, giving a slight preference to those

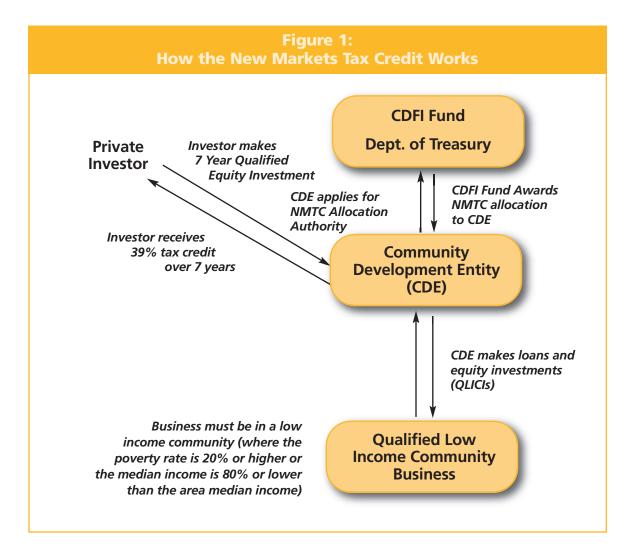


Table 1: NMTC Allocation Authority and CDE Demand by Year

Year	Demand	Available Allocation Authority	Number of Awards
2003	\$26,000,000,000	\$2,500,000,000	66
2004	\$30,000,000,000	\$3,500,000,000	63
2005	\$23,000,000,000	\$2,000,000,000	41
2006	\$28,300,000,000	\$4,100,000,000	63
2007	\$28,300,000,000	\$3,900,000,000	61
2008	\$27,900,000,000	\$5,000,000,000	102
2009	\$21,300,000,000	\$5,000,000,000	99
2010	\$22,500,000,000	\$3,500,000,000	99
2011	\$26,700,000,000	\$3,600,000,000	70
2012	\$21,900,000,000	\$3,500,000,000	85
2013	\$25,800,000,000	\$3,500,000,000	87
2014	\$19,900,000,000	\$3,500,000,000	TBD
TOTAL	\$301,600,000,000	\$43,600,000,000	836

Source: CDFI Fund

states that have received less NMTC investment than might be expected based on the number of eligible census tracts. These efforts have largely succeeded, as activity has recently increased in states that were underserved during the early years of the program.

Despite keen competition for the NMTC, new entrants continue to gain access to NMTC allocations. Over the past five years, 111 CDEs received their first allocations. This represents approximately 20 percent of the total number of awarded allocations and indicates that successful organizations with solid business plans and a record of

performance in community development finance can participate in the program.

The allocation application puts a premium on community impact, and competition for allocation has also driven CDEs to increasingly invest in communities with higher levels of distress where conventional financing is more difficult to secure. For example, between 2003 and 2007, 48.2 percent of NMTC projects were in communities with unemployment rates more than 1.5 times the national average, but between 2008 and 2014, the number of projects in these communities increased to 54.9 percent, a jump of 14 percent.



The NMTC financed the redevelopment of several downtown properties in Hudson, New York, including an historic armory that will provide space to community organizations providing educational, social, and health services programs including the Hudson Area Library and a new Senior Center. Image from CEI Capital Management.

The 2015 CDE Survey: An Annual Snapshot of NMTC Activity

Every winter, NMTC Coalition conducts a survey of all **Community Development Entities (CDEs)** that have received an NMTC allocation. CDEs are asked to report on the prior year's NTMC activity. The CDFI Fund collects data on the NMTC program, but that data is typically not released to the public for two years. Because of this lag in data, the Coalition's surveys provide the industry's most up-to-date data on the trends and successes of the NMTC program.

The Coalition's most recent survey of CDEs covered NMTC activity in the 2014 calendar year. The findings demonstrate that the NMTC continues to serve as an effective tool for driving capital to areas of economic distress and creating jobs, revitalizing both urban and rural communities where the credits are employed.

A total of 67 CDEs responded to this year's survey. Survey respondents have received a total of \$16.8 billion in NMTC allocations throughout the course of the program—or nearly 40 percent of total allocation awarded since the credit's implementation in 2003. In 2014, these CDEs raised approximately

CDE Survey of 2014 NMTC Activity

Table 2: By Service Area, Number of Respondents, Total Allocation, QLICIs(\$), and QEIs(\$)

Service Area	CDEs	Total Allocation	QLICIs (\$)	QEIs (\$)
Local	15	\$1,568,000,000	\$186,029,929	\$111,114,093
Statewide	14	\$2,063,000,000	\$230,599,923	\$214,997,523
Multi-State	13	\$2,852,000,000	\$360,039,484	\$390,892,769
National	25	\$10,357,892,113	\$717,763,917	\$654,105,858
Grand Total	67	\$16,840,892,113	\$1,494,433,253	\$1,371,110,243

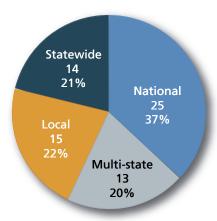
Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1 – December 31, 2014

\$1.4 billion in Qualified Equity Investments (QEIs) and deployed \$1.5 billion in financing to 239 businesses in a record **48 states** and the District of Columbia. In total, CDEs deployed about \$2.74 billion in QEIs last year. As such, these CDEs represent a substantial share of the activity in the program (see Table 2).

When applying for an allocation, CDEs must identify their target market as local, statewide, multi-state, or national. National CDEs comprised nearly 40 percent of survey respondents. These organizations constituted the largest share of capital raised (\$654 million out of \$1.4 billion), and nearly half of the financing dollars (QLICIs) (see Charts 1 and 2).

CDE Survey of 2014 NMTC Activity

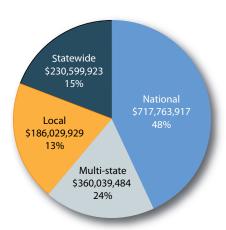
Chart 1: Number of CDEs responding by Area of Service



Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1 – December 31, 2014

CDE Survey of 2014 NMTC Activity

Chart 2: Amount of QLICIs (\$) by Area of Service



Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1 – December 31, 2014

NMTC: Catalyst for Effective Public-Private Partnerships

There are four factors to consider when looking at the NMTC investment environment.

 The New Markets Tax Credit provides a modest subsidy as compared to other targeted federal tax credits.

As noted previously, an NMTC investor receives a federal tax credit equal to 39 percent of the total Qualified Equity Investment (QEI) in a **Community Development Entity (CDE)** and the Credit is realized over a seven-year period. In addition, the NMTC is a taxable credit so investors are taxed on any capital gains or profits generated from a QEI. For this reason, the Congressional Joint Committee on Taxation estimates the cost to the federal government of the NMTC, in terms of foregone revenue, to be 26 percent. Taxpayers investing in the NMTC look for solid business deals that will yield economic return beyond the tax subsidy;

Since the inception of the program, regulated financial institutions have constituted a principal source of equity investment capital for the Credit.

This *Progress Report* indicates this trend continues with CDEs reporting that 92 percent of the equity investments secured in 2014 came from regulated depository institutions;

 Under the law, CDEs are required to invest at least 85 percent of Qualified Equity Investments (QEIs) into projects.

However, according to a Government Accountability Office (GAO) survey for 2011-2012⁴, fees and

retention only totaled 7.1 percent of total NMTC QEIs. The Urban Institute's Evaluation of the NMTC indicated that CDEs invested 97 percent of QEIs into businesses and projects⁵. In other words, the two most recent reports on NMTC indicate that investment rates are well above the requirements established in law and regulation.



The NMTC financed the historic redevelopment of the 538,000 square foot, century year-old Arcade Building in the heart of downtown St. Louis into 282 apartments and 50,000 SF of commercial space. The building, which had been vacant for years, is slated to include 202 affordable artist lofts and 80 market-rate apartments. Image from Central Bank of Kansas City.

⁴ GAO-14-500: Published: Jul 10, 2014.

⁵ Urban Institute Evaluation of the NMTC: June 2013.

 When NMTC investors pay a higher price in exchange for the Credit, more benefit flows to the low income community business.

For the first time, the Coalition asked survey respondents to report the average price investors paid in exchange for the NMTC. Respondents reported pricing raging between 78 cents and 86 cents and the average price was 83.3 cents.

Pricing has improved dramatically since the end of the Great Recession and the general trend has been positive as investor familiarity and competition for the NMTC increased. The following chart supplements our survey data with pricing data from the Urban Institute⁶, GAO⁷, and Novogradac & Company⁸ (see Chart 3):

Survey respondents were given the chance to comment on trends in pricing. Many CDEs reported a continued increase in the price of the Credit in the early months of 2015.

Over the years, Congress has made improvements to the Low Income Housing Tax Credit (LIHTC) that increased efficiency and enhanced the government's investment, and these changes may also help sustain and improve NMTC pricing.

In 1993, seven years after establishing LIHTC, Congress made it a permanent part of the Internal Revenue Code. The result: with greater investor certainty, demand spiked and pricing for housing credits went up.

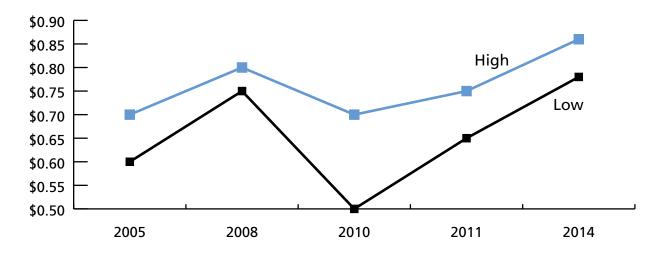


Chart 3: NMTC Pricing, 2005-2014

Source: The above chart shows the range of pricing in various surveys of NMTC investors. It includes a blend of data from the Urban Institute, GAO Novogradac & Company, and 2014 data from the NMTC Coalition's survey.

⁶ Ibid

⁷ GAO-14-500: Published: Jul 10, 2014. Publicly Released: Aug 11, 2014.

⁸ Novogradac & Company is a public accounting firm with extensive experience working with the NMTC.

In addition, Congress provided an Alternative Minimum Tax (AMT) exemption to LIHTC investors through the Housing and Economic Recovery Act of 2008. After the worst of the Great Recession this likely increased pricing as well. A higher priced credit means more investment flows to projects. According to data from Novogradac & Company, LIHTC pricing increased from about 65 cents in early 2010 to almost 94 cents by the end of 2014.

NMTC investments are not exempt from the AMT. Providing AMT relief from the AMT⁹ would diversify the pool of investors who could invest in the NMTC, opening up the NMTC investor market to new investors, including community banks and corporate investors that are currently restrained by AMT considerations. Moreover, making the NMTC permanent would improve pricing, relieving the uncertainty created by last minute annual extensions of the Credit.

THE LEVERAGE STRUCTURE:

Most NMTC investments involve the "leverage structure", which helps deliver additional capital to qualified businesses than might be offered through a direct equity investment. In the leverage structure, an intermediary entity, structured as an LLC or partnership, receives equity investments from NMTC investors as well as debt from other sources, and all of the LLC's funding (debt and equity) is then invested as a QEI in the CDE. The CDE can then distribute the federal tax credits to the LLC (its QEI investor), which, as a flow-through entity, can pass the entire tax credit up the chain to its equity investments reported by survey respondents utilized the leverage structure.

The survey found that CDEs using the leveraged structure are looking to a variety of sources for their



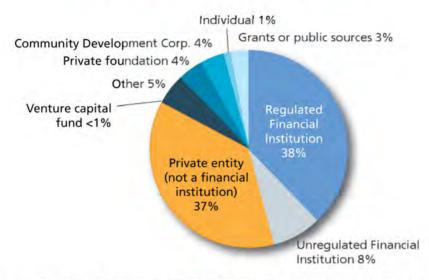
⁹ Both S. 591 and H.R. 855 provide AMT relief for NMTC investors.

leveraged debt – though a majority of the debt comes from regulated financial institutions (38 per-

cent) and other private entities including the project sponsor (37 percent) (see Chart 4).

CDE Survey of 2014 NMTC Activity

Chart 4: Sources of the Leverage LLC's Debt



Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1 – December 31, 2014

As mentioned previously, equity investments made through the leveraged structure came almost exclusively (92 percent) from regulated financial institutions (see Chart 5).



The NMTC enabled Seawall Development Company to transform three abandoned industrial blocks in Baltimore's Remington neighborhood into a mixed-used revitalization project featuring affordable housing, a health clinic and commercial retail. Image from Seawall Development Company/Low Income Investment Fund.

CDE Survey of 2014 NMTC Activity

Chart 5: Sources of Equity Through the Leveraged Structure



Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1 – December 31, 2014

Lending and Investment

Survey respondents were asked to report on the financial products made available through the NMTC. As noted, CDEs make financing available to businesses through Qualified Low Income Community Investments (QLICIs), which are principally loans and investments in businesses located in low income communities. In 2014, the survey

respondents made 560 QLICIs totaling nearly \$1.5 billion in financing. Of those QLICIs, 537 came in the form of loans to 239 qualified businesses, providing more than \$1.4 billion in new financing. The remaining 23 QLICIs came in the form of equity investments in businesses (15), the purchase of qualified loans from other CDEs (1), financial counseling to low income businesses or individuals (2), and loans to another CDE (5).

Table 3: Types of QLICIs Offered

QLICI purpose	Number	Amount
Loan to a business	537	\$1,412,401,769
Equity investment in a business	15	\$38,979,909
Purchase of a qualified loan from another CDE	1	\$2,600,000
Financial counseling to low income businesses or individuals	2	\$7,501
Loans to another CDE	5	\$11,088,000
Total	560	\$1,494,433,253

Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1, 2014 - December 31, 2014 -

UCAN's Chicagoland Institute for Transforming Youth new campus in the impoverished North Lawndale neighborhood will include a therapeutic youth home specifically designed for wards of the child welfare system who have been abused and/or neglected and have histories of severe trauma. This NMTC project will create 426 temporary construction jobs, 200 part-time supportive jobs for local youth, and 10 permanent jobs available for local low-income residents. Image from Southside Community Optimal Redevelopment Advisors.



Respondents' loans included a variety of below market and/or non-traditional features. Chart 6 highlights the range of below market and non-traditional features associated with NMTC debt products. Financing debt with below market interest rates, longer than standard terms, lower than standard origination fees, and longer than standard interest only payments were the most common features of debt products.



Watch our new video to learn more...

Types of Businesses and Economic Development Projects Financed

The NMTC is a relatively shallow credit, and banks typically only receive an annual return between 5 and 7 percent. The biggest beneficiaries of the NMTC

are the businesses and economic development projects that receive billions annually in gap financing to support new facilities or equipment, community amenities, and other important projects.

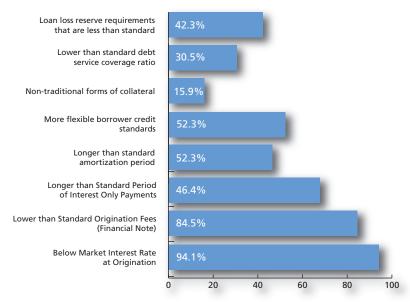
All businesses eligible to receive financing under the NMTC are called Qualified Active Low Income Community Businesses (QALICBs). To qualify as a QALICB, a business must be located in a low income community, in addition to conducting business and deriving at least 50 percent of its income in a low income community.

Survey respondents were asked to provide a description of the types of businesses financed, choosing from one of 33 categories. More than half

The Makah Dock project in Neah Bay, Washington, involved the replacement of the only commercial fishing dock within the Port of Neah Bay, which is of vital importance to the Makah Tribe and other non-tribal commercial fishing operations. The project preserved approximately 400 FTE jobs. Image from the National Development Council.

CDE Survey of 2014 NMTC Activity

Chart 6: Features of NMTC Financial Products Offered by CDEs Percent of 2014 Projects (out of 239 total projects)



Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1 – December 31, 2014

(53.5 percent) of NMTC projects reported by respondents fall into one of three categories: manufacturing or industrial, mixed-use, or healthcare facility (see Table 4). Businesses categorized as

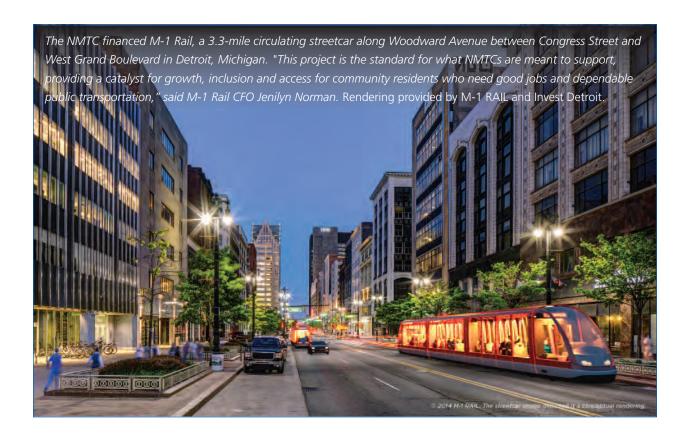
"other" typically include loan funds, multi-tract economic development projects, and operational businesses that do not fit the below categories.

Table 4:
Types of Businesses Financed, QLICIs, Total Project Cost

Industry	Total Projects	Total NMTC amount	Total Project Cost	FTE jobs	Con- struction jobs	FTE jobs at tenant business	Total jobs
Administrative, support, office/ business services	9	\$98,725,317	\$124,105,596	370	655	1,765	2,790
Agriculture, forestry, timberlands, fishing and hun	ting 1	\$1,000,000	\$1,000,000	18			18
Building material, hardware, garden equipment, or supplies store	2	\$446,500	\$2,705,788	7			7
Charter school	13	\$133,371,854	\$227,319,233	155	1,130	641	1,926
Child care center	1	\$6,045,000	\$6,045,000		160	4	164
Convenience store	1	\$652,325	\$940,000	4	15		19
Electronics and appliance store	1	\$284,000	\$284,000	5			5
Elementary or secondary school (non-charter)	4	\$57,590,000	\$60,970,786	50	466	41	557
Finance or insurance	3	\$4,175,000	\$4,665,000	38			38
Food services, caterers	1	\$12,840,000	\$24,450,000	60	80		140
Grocery	4	\$27,042,601	\$30,138,042	110	157	125	392
Health care facility	27	\$325,029,849	\$479,995,875	1,176	3,308	1,002	5,486
Hotel or other accommodation	9	\$115,216,390	\$266,120,811	212	964	380	1,556
Housing	5	\$13,186,201	\$13,422,201	12	148		160
Human or social service or facility	9	\$126,085,000	\$135,008,892	67	804	243	1,114
Information technology	2	\$18,325,000	\$20,975,895	241	39		280
Manufacturing or industrial	67	\$492,161,140	\$1,062,980,956	3,505	2,798	3,646	9,949
Mixed-use	21	\$338,477,385	\$677,342,199	321	5,413	2,878	8,612
Other	8	\$71,321,458	\$80,697,756	43	481	269	793
Other educational service or facility (university, vocational training, etc.)	7	\$79,337,222	\$141,671,731	49	582	271	902
Performing art, cultural, entertainment, recreation or other amenity	n, 4	\$26,774,960	\$35,514,379	15	212	92	319
Pharmacy or health store	1	\$245,213	\$245,213	2		2	4
Professional (e.g. legal, accounting, architectural, advertising, PR), scientific, and technical)	5	\$17,514,909	\$20,102,206	1,089	471		1,560
Restaurant	6	\$12,445,665	\$20,575,768	58	25	31	114
Retail store	3	\$1,209,750	\$6,719,600	22			22
Transportation or warehousing	8	\$132,219,971	\$276,789,420	507	832	81	1,420
Utilities (e.g. gas, electric power, energy, water and sewage)	8	\$30,139,545	\$110,603,000	170	375		545
Wholesale trade	9	\$18,757,197	\$24,652,569	25	244	218	487
Total	239	\$2,160,619,452	\$3,856,041,916	8,331	19,359	11,688	39,378

Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1, 2014 - December 31, 2014

Note: The QLICI total in the chart above (\$2.1 billion) is higher than the total reported earlier (\$1.5 billion) because it includes NMTC financing from other CDEs that did not participate in the survey.

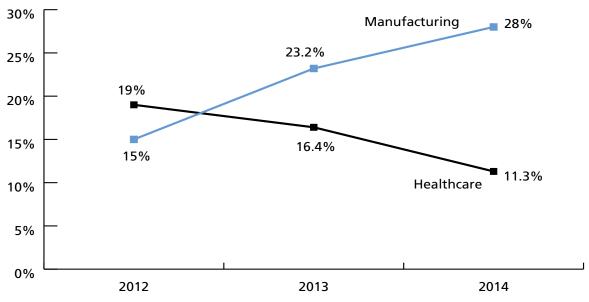


Between 2003 and 2011, the NMTC financed a growing number of healthcare facilities. However, this trend appears to have slowed in recent years (see Chart 7). Meanwhile, the financing of manu-

facturing and industrial businesses has surged from 15% of the projects reported in our survey of 2012 CDE activity to 28 percent of the projects reported in 2014.

CDE Survey of 2014 NMTC Activity

Chart 7: NMTC Industry Trends 2012 - 2014 - Manufacturing and Healthcare



Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1, 2012 – December 31, 2014

Impact of NMTC: Jobs, Investment and Amenities in Distressed Communities

The primary purpose of the NMTC is to provide communities with the patient flexible capital they need to create jobs and improve communities. Because of the NMTC's flexibility, community impacts are diverse and wide ranging.

For the second consecutive year, **Community Development Entity (CDE)** survey respondents were asked to report on the impact of project-level investment activities during calendar year 2014.
CDEs detailed the impact of each project, the amount of investment, and the characteristics of the surrounding community.



The NMTC assisted in the acquisition of machinery and equipment to be used in a newly constructed tire manufacturing facility in rural West Point, Mississippi. The plant is expected to create up to 490 permanent, full-time, quality jobs, as well as approximately 985 construction jobs. Image from Dudley Ventures.

Survey findings reinforce the impact data collected between 2003 and 2012 by the CDFI Fund, data modeled by the NMTC Coalition's *NMTC Economic Impact Report* (December 2012), and the Urban Institute's recent report on the NMTC. The findings show that the NMTC continues to serve as an effective tool for job creation and revitalization in

some of the country's most economically challenged communities.

JOBS IMPACT

Survey respondents reported on full-time equivalent jobs (permanent jobs contributing the operation of a business) and construction jobs (jobs serving the construction or renovation of real estate).

Respondents reported creating 20,019 full-time jobs and 19,359 construction jobs in 2014, for a total of 39,378 jobs (see Table 5).

Table 5: Jobs Reported by 2014 Survey Respondents

Type of Jobs	Number of jobs
Full time Jobs ¹⁰	20,019
Construction Jobs	19,359
Total Jobs	39,378

Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1, 2014 – December 31, 2014

Of the 20,019 full-time jobs created, more than 60 percent (12,528) were created in three sectors: industrial or manufacturing, healthcare, and mixeduse. More than 75 percent of the construction jobs (11,519) were generated by real estate projects involving the construction of manufacturing facilities, mixed-use developments, and healthcare facilities.

CDEs were particularly adept at creating jobs in communities experiencing an unemployment crisis (with unemployment rates 1.5 times the national average), creating 18,745 total jobs in those communities, including more than 4,000 in rural communities with high unemployment.

¹⁰ Includes FTE jobs and jobs created at the tenant business



Metropolitan Ministries has been a mainstay in providing housing and programs for the homeless in Tampa Bay for more than 40 years. Thanks to \$11 million in NMTC financing, they were able to build an on-site elementary school and youth activity center and expand their daily meal program to include Pasco County, providing 3,000 meals daily for the homeless. Image from Florida Community Loan Fund.

COMMUNITY AMENITIES

The NMTC was not only designed to help businesses secure the resources they need to create jobs, but also to enhance community revitalization efforts by financing community facilities and other important amenities.

Because of a dearth of available capital, residents of low income communities often lack adequate access to fresh food, state of the art healthcare facilities, or cultural amenities that more affluent communities take for granted, including performing arts centers and theaters. Nonprofit service providers in underserved communities face tremendous difficulties in securing the capital needed to secure affordable office space or expand to serve more residents.

Nearly 40 percent of projects reported by survey respondents involved community facilities such as schools, healthcare centers, or facilities for nonprofit service providers. This data tracks closely with an analysis of CDFI Fund data from 2003 to 2012 showing that more than one-third of total NMTC project funding goes toward the construction or rehabilitation of community facilities.

As noted in the previous section, the most striking trend in the financing of community facilities is the move away from healthcare facilities after growth in that sector during the first years after the Great Recession. The NMTC industry has increasingly financed educational facilities, including charter schools, traditional public schools, university facilities, and vocational training centers.

COMMUNITY AMENITIES

- > 395 affordable housing units
- ▶ 4 supermarkets
- ▶ 27 healthcare facilities
- ▶ 4 performing arts centers or cultural amenities
- ▶ 10 human or social service or facilities
- 24 educational facilities

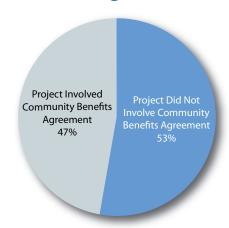
Source: New Markets Tax Credit Coalition, survey of NMTC CDE activity January 1, 2014 – December 31, 2014

Community Benefits Agreements

In addition to providing direct funding for community facilities, many NMTC projects involve formal or informal community benefits agreements (CBAs) between CDEs and businesses benefiting from the NMTC financing. Nearly one-half of projects reported by CDE survey respondents involved some community benefits agreement (see Chart 8).

CDE Survey of 2014 NMTC Activity

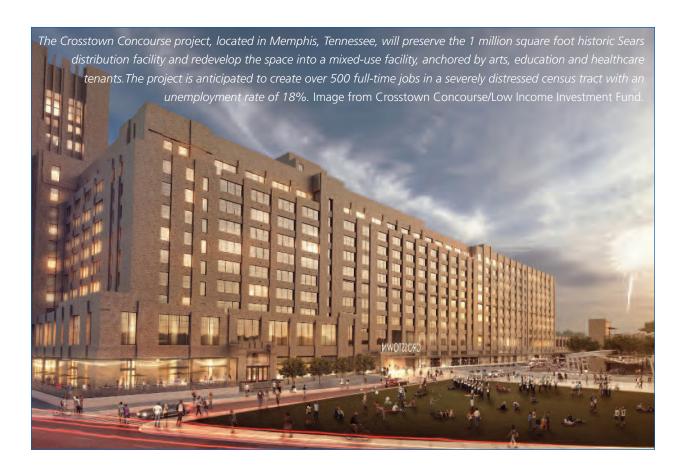
Chart 8: Projects Involving Formal or Informal Community Benefits Arrangements



Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1 – December 31, 2014

These agreements vary widely. Examples of benefits that businesses agreed to deliver:





- Creating a minimum number of jobs with quality wages and benefits for local residents;
- Supporting community college and high school partnerships or investing in the community through apprenticeship, training programs, and internships;
- Holding a significant percentage of newly renovated real estate space at below market rent for the use of local non-profits; and
- Offering grants to local charities.

Characteristics of Communities Receiving Investments

The NMTC targets about 40 percent of nation's census tracts that meet the statutory requirements for economic distress¹¹. While median incomes are based on area or statewide data, the incidence of

poverty and the unemployment rate are national numbers and using this measure is a way to understand the profile of the communities receiving NMTC financing (see Figure 2).

Figure 2: Poverty and Unemployment in America

In the summer of 2014, the Census Bureau reported that for 2013, 45.3 million people in the United States were living below the poverty line. The poverty line for a family of four was \$23,824. According to the Department of Labor and the Bureau of Labor Statistics the unemployment rate averaged 6.2 percent in 2014.

¹¹ NMTC Coalition analysis of CDFI Fund eligibility data

Most NMTC financing goes to severely distressed communities that far exceed program requirements for poverty and income. According to data from the CDFI Fund, between 2003 and 2013, over 70 percent of NMTC financing went to severely distressed communities with poverty rates above 30 percent, median incomes below 60 percent of the area median income or unemployment rates 1.5 times the national average.

The 2014 survey data shows that CDEs are continuing to make investments in severely distressed communities. For example, 37.7 percent of NMTC investments reported were located in communities where the poverty rate exceeded 30 percent, 51.1% were in communities with unemployment rates 1.5 times the national average, and 50.6 percent of investments were in communities where the median income is 60 percent of the area median income (see Table 6).

Table 6: Investments by Area of Higher Distress

Community Characteristic Percent of Projects

Poverty Rates Greater than 30%?	37.7%
Median Income Less than 60% of Area Median Income	50.6%
Unemployment at Least 1.5 Times the National Average?	51.1%
Severe distress (one or more of the above characteristics)	71.1%

Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1, 2014 – December 31, 2014

Developing and financing businesses and projects in those high distress communities is challenging in



The Salvation Army's new Freedom Center in Chicago will serve over 22,000 residents in the campus' Corps Community Center, expand capacity by almost 30 percent for its Pathway Forward program and create up to 10 new jobs while retaining 174 positions. Image from IFF.

terms of infrastructure, the availability of other sources of private-sector financing, and uncertain markets, and it would not be possible without the NMTC.

Use of Targeted Populations

The American Jobs Creation Act of 2004 (P.L. 108-357) included a provision expanding the definition of a NMTC qualified low income community to include Targeted Populations, defined as "certain individuals, or an identifiable group of individuals, including an Indian tribe, who (A) are low-income persons; or (B) otherwise lack adequate access to loans or equity investments." This change was particularly important for community development entities (CDEs) working in rural communities where pockets of poverty are not apparent when looking strictly at the poverty rate or area median gross income of a census tract. The NMTC's strict census tract targeting also created a challenge for CDEs in urban areas where a business or nonprofit service provider may be located just outside of a qualified low income census tract even through the business activity clearly benefits a low-income population

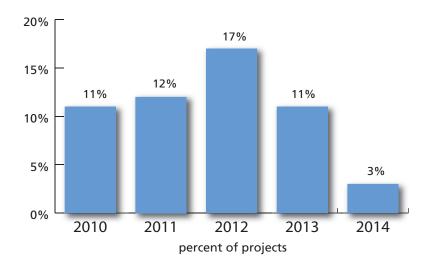
through employment and/or services. Generally, projects can qualify one of the following three ways:

- At least 50 percent of the entity's total gross income for any taxable year is derived from sales, rentals, services, or other transactions with individuals who are low-income persons.
- At least 40 percent of the entity's employees are individuals who are low-income persons. The determination of whether an employee is a low-income person must be made at the time the employee is hired.
- ▶ At least 50 percent of the entity is owned by individuals who are low-income persons. The determination of whether an owner is a low-income person must be made at the time the OLICI is made.

The Coalition's last four surveys show that, typically more than 10% of projects have used targeted projects as an eligibility factor (See Chart 9), though this year the percentage dropped significantly to 3%.

CDE Survey of 2014 NMTC Activity

Chart 9: Projects Utilizing Targeted Populations



Source: New Markets Tax Credit Coalition, survey of NMTC allocatee activity January 1 - December 31, 2014

THE NEW MARKETS TAX CREDIT (NMTC) IN ACTION





leaders in BOTH PARTIES agree: EXTEND THE NEW MARKETS TAX CREDIT

"The New Markets Tax Credit Program has a history of success in Missouri, leading to billions of dollars in investments and thousands of jobs in rural and urban communities around the state. I'm pleased to join my colleagues to introduce this bipartisan bill and make this tax credit permanent so that we can continue to encourage investment, job creation, and economic growth in low-income communities in Missouri and nationwide."

-Senator Roy Blunt (R-MO), describing the New Markets Tax Credit Extension Act of 2015 (S. 591), a bipartisan bill he introduced with Senator Chuck Schumer (D-NY) to permanently extend the NMTC. Identical legislation, H.R. 855, was introduced by Reps. Pat Tiberi (R-OH), Richard Neal (D-MA), and Tom Reed (R-NY), and the President included a similar proposal in his FY 2016 Budget proposal.

For more information on the NMTC extension effort, visit nmtccoalition.org.



At a time when many rural hospitals are closing, Bath Community Hospital in Hot Springs, VA is alive and thriving, thanks to a NMTC in 2014.

AND FEDERAL COMMUNITY DEVELOPMENT

The 114th Congress has again set its sight on tax reform. The President has also indicated an interest in business tax reform.

As usual the two sides disagree on an important point: revenues. The Congressional majority has indicated little interest in raising revenue though tax reform seeking instead to simplify the tax code: reducing tax expenditures in favor of lower rates. The Administration is also interested in lower rates, but also seeks to raise revenue. According to the Congressional Budget Office (CBO), the FY 16 budget raises \$134 billion over 10 years, in additional tax revenue from business tax reform. Some of that will go to lowering rates; most of the remainder is devoted to financing Administration priorities.

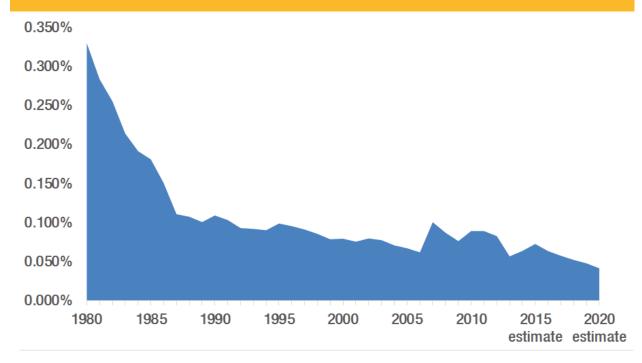
As the two sides maneuver to ascertain whether any form of tax reform is possible, it is important to keep in mind the low cost and unique role that NMTC plays both in communities and in the evolving nature of federal community development policy.

A Brief History:

On January 8, 1964, President Lyndon Johnson used his first State of the Union Address to declare an "unconditional war on poverty in America." While Johnson's proposals most famously expanded direct assistance to low income individuals through the creation of Medicare, Medicaid, and Food Stamps, the centerpiece of the War on Poverty was the Economic Opportunity Act, which created the Community Action Program (CAP). By 1966, CAP was funding some 1,600 local multi-purpose community action agencies (CAAs)¹¹. This legislation, along with amendments enacted in 1967, helped pave the way for the proliferation of place-based nonprofit community development corporations (CDCs) and later Community Development Financial Institutions (CDFIs) and Community Development Entities (CDEs) that would use the New Markets Tax Credit. These organizations have deep ties to local communities and a history of providing technical and financial assistance to local businesses, nonprofits, and residents. They work to secure the public and private resources needed to address community challenges including inadequate housing, blight, or lack of access to health care providers.

¹¹ Robert F. Clark. The War on Poverty: History, Selected Programs and Ongoing Impact. Lanham, MD: University Press of America, 2002

Federal Community and Regional Economic Development Outlays as a Percentage of GDP



Source: NMTC Coalition analysis of OMB historical tables.

The successes and failures of Johnson's original proposals — many of which have since been dismantled — will be debated until the end of time, but Johnson's landmark declaration marked the emergence of a bipartisan consensus that the federal government should play a role in supporting place-based community revitalization in distressed urban and rural areas. While the general bipartisan consensus behind federal community revitalization efforts has endured since the 1960s, the level of available funding for projects in underserved communities has declined significantly, mostly due to cuts in discretionary spending.

Over the past 35 years, federal spending for community development has declined significantly. According to data from OMB, as measured as a percentage of GDP, federal spending for community development – HUD,

Agriculture, Commerce, and Interior — has fallen by 75 percent since 1980¹² (See chart above).

These spending cuts show no signs of slowing, and they were not all relegated to the 1980s. For example, federal appropriations for HUD's CDBG Formula Grants fell by 29% between FY 2010 and FY 2015. The Housing and Community Development Act of 1974 consolidation a number of anti-poverty programs into Community Development Block Grants (CDBG). For many years CDBG was the flagship of federal community development efforts. The first budget request, made by President Ford for Fiscal Year 1976 totaled \$2.6 billion. Forty years later, the Fiscal Year 2016 request by President Obama is \$2.8 billion.

As cuts to traditional grant-in-aid escalated in the 1980s, members of both parties – including

¹² OMB Historical Tables.



In 2014, the NMTC helped Southside Medical Center, a federally qualified health center, improve its facilities, hire additional staff, and restructure its debt. Image from Atlanta Emerging Markets.

conservatives like Jack Kemp (R-NY), began to rally behind a different approach. In 1981, Representatives Kemp (R-NY) and Robert Garcia (D-NY) introduced the Urban Development and Enterprise Zone Act, which would provide businesses with incentives for locating in designated distressed communities. While the Kemp/Garcia legislation never moved, beginning with the Tax Reform Act of 1986 (P.L. 99-514), Congress increasingly followed Kemp's lead. The 1986 Act established the Low Income Housing Tax Credit (LIHTC), which is now the nation's largest financier of affordable housing. The Omnibus Reconciliation Act of 1993 (P.L. 103-66) permanently codified the LIHTC and also created Renewal Communities, Empowerment Zones and Enterprise Communities, programs with defined geographies for revitalization.

Building on the success of that model, Congress enacted the Community Renewal Tax Relief Act of 2000. The bipartisan legislation included \$25 billion in new authorities, including the creation of a companion New Markets Venture Capital program administered by the Small Business Administration, 40 new Community Renewal Zones, an increase in the Low Income Housing Tax Credit, and of course, the creation of the New Markets Tax Credit.

The Community Renewal Tax Relief Act authorizing the New Markets Tax Credit drew support from across the political spectrum including prominent Republican Members of Congress such as Senator Olympia Snowe (ME), Sen. Rick Santorum (PA), Rep. JC Watts (OK), and then Rep. James Talent (MO).

Reductions in federal discretionary spending made tax expenditures like the NMTC an increasingly important element in the federal toolkit for community revitalization. The NMTC is now one of the only federal gap financing programs available to help disinvested communities create jobs, improve services, and break out of the cycle of poverty.

Unlike many of the traditional grant programs, the NMTC continues to enjoy broad bipartisan support, and yet, the vitality of the Credit is now threatened. Because the NMTC lacks an annual inflation adjustment, the level of NMTC financing available to distressed communities has declined. In 2007, \$3.5 billion in NMTC allocation authority was available, the same amount available in the 2014 application round. After adjusting for inflation, NMTC allocation authority has declined by 12.3 percent since 2007. The decline of NMTC allocations – when coupled with the decline in federal community development spending – makes the task of revitalizing underserved communities increasingly difficult.

The NMTC Should Be Expanded and Renewed

The NMTC meets an important and critical need for private-sector investment in economically distressed urban and rural communities. It blends the market incentive of Jack Kemp's Enterprise Zones with the flexible community-driven approach of Lyndon Johnson's Economic Oppor-

tunity Act. Perhaps most importantly, it has not only achieved its purpose, but it has done so at a relatively low cost to the federal government. While investors receive a modest return to incent their investment, businesses and economic development projects receive substantial benefits from NMTC financing. Moreover, these investments drive and attract other investments to the community, creating a ripple effect of economic development in some of the poorest and most hard-hit areas in America. With dwindling government resources, the priority should be given to programs that achieve their purpose efficiently, and the NMTC hits the mark.



The NMTC helped finance the North Omaha Intergenerational Campus, a partnership between Holy Name Housing Corporation and Heartland Family Service to provide services to low-income persons in one of the most distressed communities in the Midwest. From feeding underserved senior citizens to protecting disadvantaged children, this project uses an existing building to directly impact the quality of life in North Omaha. Photo from Dakotas America.

