

CHIP - The "But For" Test



What is the "But For" Test, and who determines if it has been met?

VEPC will review each application - other than those for which the housing development is an affordable housing development - to determine whether the infrastructure improvements proposed to serve the Housing Development Site and the proposed housing development *would not have occurred* as proposed in the application or *would have occurred in a significantly different and less desirable manner* than as proposed in the application **but for** the proposed utilization of the incremental tax revenues.

A non-exhaustive list of factors VEPC may consider around the question of what is a "significantly different and less desirable manner" may include, but is not limited to:

- a housing development occurring significantly **later** than it could occur with CHIP financing,
- a housing development that would include **fewer units** without CHIP financing,
- a housing development that is **significantly less affordable** than could occur with CHIP financing.

What types of housing must meet the "But For" Test?

1. Moderate-Income - A housing development in which at least 25% of the units are for households earning 150% or less of area median income (AMI).
2. Market Rate - A housing development in which there are no income restrictions on any of the units.

Where can I find out what the area median income (AMI) is for an "affordable housing development" or a "moderate-income housing development" in my municipality?

The Vermont Housing Data website, also known as HousingData.org, provides Vermonters with tools for making more informed decisions about affordable housing. This website is loaded with valuable data and information.



Area median Income can be found by following this path: [Home>> Vermont Community Data Profiles>>Income & employment>> Area Median Income \(AMI\)](#). You also can use this simple table for quick reference: [Home Purchase Price & Rental Affordability Thresholds by Income Level and Household Size](#).

[What does "area median income" \(AMI\) mean?](#)

Area Median Income (AMI) is the midpoint household income for a specific geographic region, meaning half of families earn more and half earn less, used primarily to determine eligibility for affordable housing and other federal/state programs. Calculated annually by the U.S. Department of Housing and Urban Development (HUD), AMI adjusts for household size, with various income levels (like 30%, 50%, 80% AMI) defining different tiers of affordability.

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