Rental Affordability Reexamined
A New Look at Affordability Using Renter Income Instead of Family Income

Steve Guggenmos
571-382-3520
steve_guggenmos@freddiemac.com

Kevin Burke
571-382-4144
kevin_burke@freddiemac.com

❖ The percentage of units affordable to very low-income renter households has stayed below 10% since 2010 when using renter income as the income measure. That's more than four times lower than when using the most common income measure: median family income.

❖ Despite this difference in affordability level, the trend of affordability using renter income has, curiously, improved, whereas the trend using family income has clearly worsened.

❖ Shifting household composition partly explains why affordability is not getting worse over time. Some former owners, with high incomes compared with most renters, switched to renting which drove up income for this new renting cohort.

❖ Also, the number of wage earners in each renter household grew over this period, which increased household income without boosting the income of individual renters.

❖ Adjusting for this, we find that affordability has not improved when using renter income but instead remains essentially flat over time and extremely low in all periods.

Rental housing affordability is a well-established issue that has been a central theme of numerous academic and industry publications following the Great Recession. Now, in the midst of the COVID-19 pandemic, discussion of the topic has broadened as millions of Americans have lost their jobs and are struggling to pay rent. Aggressive legislative action has softened the blow for many, but millions still face financial hardships that impede their ability to make timely rent payments. While data from the pandemic is still too new to extensively analyze, we can look at historical data using novel approaches to better understand rising unaffordability to guide continued research on the topic.

Last year, we released the research report *Diminishing Affordability – Inescapable* that documented the change in the rate of affordable housing across the nation from 2010 to 2017. In that analysis, we found that the share of multifamily rental units affordable to very low-income (VLI) households, which make 50% of the area median income (AMI), dropped sharply during this period, from 56% to 39%. The affordability drop was most pronounced in the nation’s fastest growing metros, such as Austin, Denver and Orlando.

To better understand and address the affordability crisis, we are introducing a new analysis that uses alternative data to further shed light on the issue. This analysis is similar to the one used in the *Diminishing Affordability* paper, but instead uses only renter income (for all rental types) as opposed to AMI, which includes income from both renter and owner households.

AMI has become the industry standard for measuring affordability, but in this paper, we highlight some of the shortcomings of relying solely on this income measure to examine affordability. We also show that using renter income can produce slightly biased growth rates, but that studying the causes and effects of these biases can help us better understand the rental housing market.
Comparison of Affordability Using Renter Income Versus AMI (Family Income)

Using renter income, we find that the rental affordability problem is more severe than in studies that use AMI. Median renter income (MRI) is considerably lower than AMI, which means that fewer units are classified as affordable in each income bucket. Since 2010, fewer than 10% of all rental units are affordable to households making 50% of MRI — a staggering statistic.

However, running the analysis using renter income does not show significant changes in affordability levels over time, which on the other hand, were severe in the Diminishing Affordable study. In fact, the story of shrinking rental affordability largely disappears. While some metro areas experienced worsening affordability over the course of the study period (2010 to 2018), the effect was not widespread. On the surface, this result is counterintuitive with our own and most industry research that finds worsening conditions for renters is pervasive.

In this analysis, we provide an explanation for why using a different income measure can produce vastly different results. In particular, we examine how changes in the national homeownership rate affect renter income growth and how this can distort rent to income ratios over time.

We identified two key results from using renter income instead of family income:

1. In any given year, the percentage of rental units affordable to VLI households (50% of median income) and low-income (LI) households (80% of median income) is substantially lower.
2. The trend from 2010 to 2018 suggests that more units are affordable, but this change is partially driven by factors that are separate from individuals realizing better housing affordability due to higher earnings or lower rents.

We take a nuanced look at affordability in this paper to shed light on new perspectives that shape our view of rental markets. The results reflect, at least in part, the post-Great Recession shift away from homeownership.

Shifting Household Composition and Its Effects

Explaining the difference in affordability levels compared with our previous analysis is straightforward – renters generally earn significantly less than owners which means that median rent is very high relative to MRI. However, explaining the difference in the trend over time is more complex. We believe that a phenomenon known as Simpson’s paradox is one driver behind the apparent lack of worsening affordability and helps to explain the movement in the levels over time.

Renter income growth, as calculated from American Community Survey (ACS) microdata, can be influenced by factors other than individuals realizing higher incomes over time. The arrival of higher income households into the renter group can skew growth rates higher than the income of a typical renter. The national shift to rental housing since the Great Recession has resulted in previously owner-occupied households, with generally higher incomes, becoming renters. In addition, a high percentage of newly formed households opted to rent.

In this analysis, we attempt to disentangle this skew. However, because we are not working with a longitudinal data set, we are not able to disentangle the effect completely. Consequently, direct income comparisons throughout time are less meaningful for renter households than for all households.

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1 More information on this is available in the “Methodology and Notes” section of the paper.
National Affordability Analysis

The income of renter households grew substantially from 2010 to 2018. Exhibit 1 shows that median income for renters grew by 31.4%, which exceeded this period’s rent growth of 26.7%, according to the ACS microdata.\(^2\) The effect is widespread — MRI growth surpassed rent growth in 234 (62.2%) of the nation’s metros areas.\(^3\)

Exhibit 1: Growth in Median Rent and Median Renter Income (MRI)

![Graph showing growth in median rent and median renter income from 2010 to 2018.](image)

Comparing rent and income illustrates how affordability drivers have changed. We can apply metro level renter income to unit-level rent to find the percentage of units affordable at varying income levels.

The analysis for this paper differs from the approach in our previous report in two key ways. First, we studied all renters, not just multifamily renters like we did before. Because we are now exploring the topic of renter income, we did not limit the analysis by further splicing the pool of renters into multifamily and non-multifamily renters. The difference between the two renter cohorts is not substantial, as demonstrated in the appendix.

Second, we use the median income for renters instead of the Federal Housing Finance Agency (FHFA) set income, which uses family income derived from both renters and owners.\(^4\) Renter income is roughly 46% lower than family income, which causes a drastic change in unit-level affordability. In 2018, MRI was $41,000\(^5\) while the weighted average FHFA income across all Metropolitan Statistical Areas (MSAs) was roughly $76,300. Switching from family income to renter income is the primary reason that the affordability levels reported here are so low.

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\(^2\) Using other data sources for rent, however, we find that the rate of growth is much higher than this. According to Reis, market rent grew by 38.4% during this period.

\(^3\) When comparing mean income instead of median income, we find that renter income growth still exceeded rent growth, 34.1% against 28%, with the majority of metros (257 – 68.4%) adhering to this trend.

\(^4\) FHFA income, which was used in the *Diminishing Affordability - Inescapable* paper, uses family income ultimately sourced from ACS.

\(^5\) This will not match readily available ACS data exactly because this number is derived from microdata for MSAs.
Is the Affordability Crisis Improving?

Combining both these changes gives a much different picture of affordability. Exhibit 2 shows the percentage of units affordable at 50% MRI, 80% MRI, 100% MRI\(^6\) and above 100% MRI. For example, 16.9% of all rental units in 2010 were affordable to renter households making between 50% and 80% of the median income among renters. The percentage in this bucket grows over time, up to 18.7%, which implies there are relatively more units affordable to this segment of the rental market.

This trend is not what we saw in our prior analysis and goes against typical market sentiment that the affordability crisis is in fact worsening.

Exhibit 2: Housing Supply by Affordability Category Across Metros Nationwide

<table>
<thead>
<tr>
<th>Year</th>
<th>50% MRI</th>
<th>80% MRI</th>
<th>100% MRI</th>
<th>100%+ MRI</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>55.8%</td>
<td>18.7%</td>
<td>16.9%</td>
<td>8.6%</td>
</tr>
<tr>
<td>2011</td>
<td>57.1%</td>
<td>18.4%</td>
<td>16.2%</td>
<td>8.4%</td>
</tr>
<tr>
<td>2012</td>
<td>55.3%</td>
<td>19.1%</td>
<td>17.0%</td>
<td>8.6%</td>
</tr>
<tr>
<td>2013</td>
<td>54.5%</td>
<td>19.2%</td>
<td>17.5%</td>
<td>8.8%</td>
</tr>
<tr>
<td>2014</td>
<td>53.7%</td>
<td>19.5%</td>
<td>18.0%</td>
<td>8.9%</td>
</tr>
<tr>
<td>2015</td>
<td>52.0%</td>
<td>19.9%</td>
<td>18.9%</td>
<td>9.2%</td>
</tr>
<tr>
<td>2016</td>
<td>51.3%</td>
<td>20.0%</td>
<td>19.1%</td>
<td>9.5%</td>
</tr>
<tr>
<td>2017</td>
<td>52.0%</td>
<td>19.5%</td>
<td>19.0%</td>
<td>9.4%</td>
</tr>
<tr>
<td>2018</td>
<td>52.2%</td>
<td>19.4%</td>
<td>18.7%</td>
<td>9.6%</td>
</tr>
</tbody>
</table>

Source: Freddie Mac tabulations of 2010-2018 American Community Survey PUMS data. MRI stands for median renter income.

Far fewer units are considered affordable under this income measure because rents must fall below a lower threshold to be affordable. For example, rent considered affordable at 50% of AMI for a two-bedroom unit must be below $858 per month in 2018. But when MRI is used, that rent threshold is now $461.\(^7\) This low of a threshold is why so many renters face housing affordability challenges. The U.S. Department of Housing and Urban Development’s latest Worst Case Needs report shows that in 2015, roughly 78% of VLI renters were cost burdened (defined as spending more than 30% of their income on rent).\(^8\)

While the Diminishing Affordability paper showed a substantial reduction in the percentage of units affordable to VLI households, Exhibit 2 shows a small net increase in the proportion of VLI affordable units when using renter income. According to this measure, the proportion of rental units affordable to VLI households rose from 8.6% to 9.6%.

This result is surprising given the well-documented drop in affordability reported across the industry. However, we would not expect the VLI-affordable housing stock to decrease dramatically given that it started at such a low level. Units included in housing subsidy programs are designed to remain affordable.

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\(^6\) 100% MRI is often called middle-income, or MI.

\(^7\) Both of these rent figures are based on income across all MSAs.

so that there are always units available at very low rents, effectively providing a floor for this market segment since rents can’t increase too quickly given regulatory constraints.

Even though affordability did not worsen by this measure, still fewer than 10% of rental units were affordable to VLI households throughout the entire course of this study. In our previous study, the share of VLI affordable rental housing never dropped below 39.1%. This disparity illustrates the extreme differences in perceived affordability based on income measure.

The top end of the distribution – units that are affordable to those making more than 100% of MRI – is very large and has stayed fairly constant over the years. In 2018, 52.2% of units fell into this bucket, which is a modest decrease from the rate of 55.8% in 2010. This means that even though affordability remained relatively unchanged, more than half of all rental units were unaffordable to renters making 100% of MRI.

Further, the issue of affordability can be severely understated. Housing mismatch, which occurs when units that fall below a certain income threshold are rented to higher income households, and vice versa, means fewer affordable units are available to lower income households. In 2018, 34% of units affordable to households earning 50% of MRI were occupied by renter households earning an income above 50% of MRI.

Income Analysis – A Deeper Look

The lack of worsening affordability when using renter income is surprising given the amount of research and data that shows income growth has greatly lagged rent growth since the Great Recession. In fact, a report from Reis found that rents grew by 4.3% per year from 2009 to 2016, while salaries and wages grew by only 2.5%.9 Harvard’s Joint Center for Housing Studies (JCHS) reported in 2019 that the number of rental units charging under $800 for rent fell by four million units from 2011 to 2017.10

To better understand why our results differ so much from most industry research, we must consider what factors contribute to the growth of renter income aside from individual renter households realizing higher earnings over time. Census data does not allow for us to track the same households over time, and thus the composition of renters inevitably changed during the course of our study, resulting in skewed findings. From 2010 to 2018, the growth of renter income far exceeded that of owner income and overall income. While renter income grew by 31.4%, overall income and owner income grew by 24.8% and 23.3%, respectively. In addition, in roughly one-third of metro areas, renter income and owner income each grew faster than the overall income. While this finding may seem mathematically impossible, it’s actually a special case of Simpson’s paradox and helps us explain why renter income has grown so rapidly.11

Simpson’s paradox is a statistical phenomenon where a trend either disappears or reverses when data is broken out into different groups. As a simple example, consider a pool of five renters and five owners. Within each pool, not all households have equal income, but renters have an average income of $35,000 and owners have an average income of $70,000. Imagine that an owner household that makes $50,000 decides to rent instead of own. The average income among renters will increase to $37,500 as a result of the arrival of a household making above-average income. At the same time, owner income will increase to $75,000 as a result of losing a household making below-average income. Even though on average both owners and renters experienced an increase, no individual household income changed and the average income of the 10 households remained the same since renters are weighted more heavily (60% share) after the one household shifted to renting.

11 Simpson’s paradox is more commonly applied to cross-sectional data instead of time series data, which is what we utilize in this report. However, the basic principle of the paradox (disappearance or reversal of a trend from different tabulations) is still applicable in our analysis and as such we feel comfortable using this vernacular.
Relating this to our study, from 2010 to 2018, ACS microdata shows that the homeownership rate in MSAs fell from 64% to 62.6% as households opted to become renters. While this change may seem small at only 1.6%, it represents 1.5 million households. During the same time, the number of renter households increased by 3.9 million while owners grew by 2.9 million. The significance of this rate change is that the composition of renter households changed. During this time, many owner households became renters and newly formed households decided to rent instead of own. The fact that both owner income and the overall income growth rate were essentially the same, yet renter income managed to grow significantly faster, suggests that the owner households that made the move to renting had comparatively low incomes for owners, but comparatively high incomes for renters. This explains why owner income moved at the same rate as the nation, yet renter income grew much faster than both.

Examples of Simpson’s paradox are easier to observe for metros where both owner and renter income outpaced the overall rate, such as Jacksonville, Florida. This metro experienced an increase in VLI affordability from 7.5% to 7.9% between 2010 and 2018. MRI grew by 32.9%, while owner income grew more modestly at 20.7% but still higher than the overall income for Jacksonville at 18.0%, as seen in Exhibit 3.

Exhibit 3: Median Income Growth from 2010 to 2018 by Geography and Tenure

Jacksonville also experienced a large drop in their homeownership rate, from 66.9% to 63.2% — a drop of 3.7 percentage points. The number of owner households grew by only 31,100 while the number of renter households, which has historically added about half as many households as owners each year, grew by 47,000. Due to the large increase in renter income during this time, the analysis suggests that many new renter-occupied households, either from owners switching to renting or newly formed households, had incomes that were relatively high compared with existing renters. At the same time, their incomes were, on average, slightly lower than that of owners, which increased the median owner income.

As stated earlier, renter income levels over time are not necessarily representative of individual earnings growth. In the case of Jacksonville, a 32.9% increase in median income does not mean that the median household in 2010 now earns 32.9% more; it means that the median household in 2018 earns 32.9% more than the median household in 2010. The arrival of new households helped to shift the median point of the distribution.

\[12\] As a reminder, this will not match readily available ACS data exactly because this number is derived from microdata for MSAs.
In a simplified effort to reverse out the effect of Simpson’s paradox, we grow renter income at the same pace as all household income. We believe that this more accurately represents the income growth of an individual household, since focusing on all households largely negates the effect of shifting household composition. Under this scenario, Jacksonville’s VLI affordability share would not have grown to 7.9% — it would have shrunk to 6.8%.

**Other Considerations of Affordability – Change in Earners per Household**

We have shown that the makeup of renter households has changed over time, now including more former owners, impacting income trends of renters. Within these households is another change — a tendency to include more income earners. Over time, the average size of an American household has shrunk. Back in 1960, the average household size was 3.3 people.\(^\text{13}\) Today, the average floats around 2.5. Intuitively, one might expect that fewer people per household could negatively impact a household’s ability to afford housing since presumably there would be fewer income earners making rent payments.

However, we find the opposite result for both total households and renter households, with the effect being more pronounced for renter households. The average number of people in a renter household decreased by -2.2% from 2010 to 2018, while the average number of income earners increased by 2.4%, as seen in Exhibit 4. One explanation for this trend is that there are now fewer households with young children. Since 2010, the number of renter households in which most occupants were under 18 has decreased by -3.0%. On the other hand, renter households occupied primarily by people over 18 grew by 12.0%. This suggests there are now more shared housing situations, where multiple wage earners form a household together.

**Exhibit 4: Change in the Number of People and Income Earners per Renter Household**

![Graph showing the change in the number of people and income earners per renter household from 2010 to 2018.](graph)

Source: Freddie Mac tabulations of 2010-2018 American Community Survey PUMS data

We can estimate the boost that the additional income earners have on rental affordability. Renter households experienced an artificial boost of 2.4% because it represents higher income resulting from changing household composition instead of individuals realizing increased earnings. In 2018, the MRI nationally was $41,000. We can simply divide this by the 2.4% increase to factor out this effect:

\[
\text{Adjusted Renter Household Income} = \frac{\$41,000}{(1 + 0.02428)} = \$40,028
\]

\(^{13}\) U.S. Census Bureau and Current Population Survey
The difference between these two values is $972. This implies that MRI increased by $972 purely due to more earners per household. Translating this difference into rental affordability (calculated using 30% of income spent on rent and utility adjustments), this value is about $22 each month.

$41,000 − $40,028 = $972

\[
\frac{\$972 \times (30\% \text{ per month on rent}) \times (0.9 \text{ utility adjustment})^{14}}{(12 \text{ months})} = \$21.86
\]

Of course, not every MSA has the same MRI, so we cannot simply adjust rent payments by $22. Instead, we can apply the 2.4% difference to the MRI of each metro to see how rental affordability moves. Although this factor change seems small, it is not immaterial. With incomes adjusted based on number of earners, the number of VLI affordable units nationwide in 2018 would drop by 4.2%, or roughly 160,000 units.

**VLI Affordability Analysis — Accounting for Changing Household Composition**

Taking into account shifting household composition on both an aggregate level (Simpson’s paradox) and individual level (change in the number of earners), we can roughly estimate how VLI affordability would have changed if these two effects were captured. First, we assume that MRI grew at the same rate as all household income, calculated at the MSA level. This is a correction for the households that shifted to renting over the time period and is a simplifying assumption that we made since we don’t have data to accurately determine the true rate. Second, we will correct for the number of earners by calculating affordability based on rent per earner instead of rent per household. These two alternative scenarios are shown in Exhibit 5. Although the results are not profoundly different, it does show how shifting household composition and number of earners impacts the shift in affordability.

**Exhibit 5: Affordability Based on Shifting Aggregate and Individual Household Composition**

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14 The utility adjustment is necessary because we compare the base rent against income in our analysis and don’t explicitly account for unit-level utility costs. That is, we don’t use utility data for each individual unit because not all units have this data. We instead make a broad assumption across all units that 90% of the cost of renting is for the base rent and 10% is for utilities.
Instead of a growing number of VLI-affordable units, we see that correcting for factors relevant to income results in essentially no change to the VLI rental stock from 2010 to 2018. As stated earlier, we would not expect a sharp decrease even controlling for these variables because of the natural floor of affordable units that housing subsidy programs create. Even in the *Diminishing Affordability* paper, we found that most of the VLI loss was concentrated at the higher end of the spectrum. Deeply affordable units (15% of AMI) experienced only a modest decline from 6.2% to 5.8%. However, the 30%-50% AMI bucket declined by significantly more, from 39.8% to 27.0%.

The completely adjusted 2018 scenario (fourth bar in Exhibit 5) shows about 475,000 fewer VLI rental units compared with the 2018 baseline numbers, as seen in Exhibit 6.

**Exhibit 6: Comparison of 2018 Baseline with 2018 Adjusted Values**

<table>
<thead>
<tr>
<th>Category</th>
<th>Baseline (Unit Count)</th>
<th>Income Growth Adjustment</th>
<th>Earners Adjustment</th>
<th>Total Change</th>
<th>Adjusted Unit Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>50% (VLI)</td>
<td>3,837,691</td>
<td>– 341,677</td>
<td>– 133,460</td>
<td>– 475,137</td>
<td>3,362,554</td>
</tr>
<tr>
<td>50%-80% (LI)</td>
<td>7,436,751</td>
<td>– 1,392,225</td>
<td>– 348,886</td>
<td>– 1,741,111</td>
<td>5,695,640</td>
</tr>
<tr>
<td>80%-100% (MI)</td>
<td>7,709,220</td>
<td>– 506,815</td>
<td>– 543,522</td>
<td>– 1,050,337</td>
<td>6,658,883</td>
</tr>
<tr>
<td>100%+</td>
<td>20,743,311</td>
<td>2,240,716</td>
<td>1,025,867</td>
<td>3,266,583</td>
<td>24,009,894</td>
</tr>
</tbody>
</table>


The LI bucket has roughly 7.4 million units in the 2018 baseline but only 5.7 million after adjusting for income growth and number of earners, a 23.4% drop. The MI bucket also experienced a large drop of just over one million units relative to the baseline.

The above 100% AMI bucket experienced a large increase as a result of units moving from the more affordable buckets. Originally, in the baseline scenario, the percentage of units unaffordable to those making the median income decreased, indicating that more units were affordable to the median renter. However, after applying adjustments, the trend reverses and now nearly 3.3 million more units are unaffordable. It is important to note that regardless of which time period and adjustment method is used, more than half of all units are unaffordable to a renter making the median income.

There are many factors to consider in this analysis that are tough to capture, and this limits our ability to precisely estimate exact affordability movements. Without a longitudinal study that compares the same renters in 2010 and again in 2018, we cannot determine precisely how VLI affordability would have moved absent the Simpson’s paradox phenomenon. This is because the margin of error associated with the shift in affordability, adjusting for shifting household composition, is very large. The composition of households changes from year to year through drivers such as migration, which makes a direct comparison throughout time impossible. Despite the shortcomings of this analysis, the story that it tells is intuitive and supported by an ample amount of evidence.
Conclusion

Housing market conditions are constantly changing. Approaching the topic from diverse perspectives and using multiple data sources is helpful to improve our understanding of the market. However, interpreting housing market indicators is not always simple, and digging deep can reveal root causes of shifting conditions. This study provides a unique perspective of rental affordability in general, but also sheds light on some inadequately studied factors that can indirectly determine both the level and change over time of affordability.

Our study isolates renter income, instead of using income for both renters and owners, when measuring housing affordability for renters. The goal is to capture the affordability situation of individual households more precisely. The first finding is striking: The rental stock is not affordable to low-income renters, with fewer than 10% of rental units affordable to rental households earning 50% of MRI.

However, the trend over time by this measure suggests improving conditions, and that curious result required further analysis. We examined two of the major factors that drive the result, neither of which suggests improvement for individual renters. The first is that some former owner households have switched to renting, which increased the number of relatively high-income households that rent. The addition of these households skews income growth rates up and does not reflect improving income and affordability for individual households. Second, renter households now have more wage earners. In some cases, individuals are joining together to form a household out of necessity to have enough income to cover housing costs. This phenomenon also does not suggest improving affordability for individuals.

In our work, we illustrated how renter household makeup has changed and performed intuitive analysis to adjust for this. Post-adjustment, renter affordability is low and not improving. Our research suggests that market participants must not only continue to focus on the critical and complex issue of rental affordability, but also recognize how nuances in data collection and analysis can alter the perception of affordability.
Methodology and Notes

Our study uses American Community Survey’s (ACS) Public Use Microdata Sample (PUMS) for all data points. This data is released annually and contains unit-level data across the entire country. However, to protect privacy, the Census will randomize data to a small degree and top and bottom code certain numeric data points.

The geographic regions associated with PUMS are called Public Use Microdata Areas (PUMAs), which are areas of at least 100,000 people and which are often not coterminous with county and MSA lines. Because of this, PUMA regions cannot perfectly align with all MSA boundaries, which creates a mismatch in data. We attempted to match MSAs with PUMAs as best as possible, but inexact results were unavoidable. To correct for this mismatch as best as possible, we started by finding all intersections between PUMAs and MSA boundaries. For example, if a PUMA falls inside of two MSAs, then we’ll generate two records for that PUMA for final determination of inclusion for either metro. A PUMA will be included for the calculation of an MSA if either of these criteria are true:

1. The intersection area of the PUMA and MSA accounts for at least 20% of the PUMA’s population.
2. The intersection area of the PUMA and MSA accounts for less than 20% of the PUMA’s population, but at least 20% of the intersection area’s population is included in the MSA.

There are rare cases where this will result in two PUMAs being assigned to the same MSA. In this case, the one with the higher percentage composition gets assigned to the MSA, with preference given to first criteria. Because of the PUMA and MSA mismatch, and the use of microdata instead of summary statistics, the MSA and national figures in this paper do not always match tabulations of Census data. Figures should be very close, but there are data constraints that make perfect matches impossible.

To determine affordability buckets, the basic procedure is to compare the rent amount of each rental unit with the median income of renters for the unit’s respective metro area. This allows for us to determine, on a unit-level basis, whether or not a VLI household would be able to afford rent payments without spending over 30% of their income. If such a household is able to afford rent, then the unit is considered VLI affordable. The same was done for other household types (i.e., households making above VLI) to determine affordability buckets for each metro and the nation.
The chart below is nearly identical to Exhibit 2. The only difference is that this chart focuses on multifamily rentals instead of all rentals. The trends in these two charts do not differ significantly.

**Chart A: Housing Supply by Affordability Category Across Metros Nationwide (Only Multifamily)**

<table>
<thead>
<tr>
<th>Year</th>
<th>50% MRI</th>
<th>80% MRI</th>
<th>100% MRI</th>
<th>100%+ MRI</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>11.4%</td>
<td>15.2%</td>
<td>16.3%</td>
<td>16.8%</td>
</tr>
<tr>
<td>2011</td>
<td>8.6%</td>
<td>8.3%</td>
<td>8.7%</td>
<td>9.1%</td>
</tr>
<tr>
<td>2012</td>
<td>63.1%</td>
<td>65.6%</td>
<td>63.6%</td>
<td>66.5%</td>
</tr>
<tr>
<td>2013</td>
<td>8.7%</td>
<td>8.8%</td>
<td>8.8%</td>
<td>8.8%</td>
</tr>
<tr>
<td>2014</td>
<td>63.5%</td>
<td>63.5%</td>
<td>63.4%</td>
<td>63.4%</td>
</tr>
<tr>
<td>2015</td>
<td>8.7%</td>
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<tr>
<td>2016</td>
<td>62.2%</td>
<td>62.2%</td>
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<tr>
<td>2017</td>
<td>11.8%</td>
<td>11.8%</td>
<td>17.0%</td>
<td>17.0%</td>
</tr>
<tr>
<td>2018</td>
<td>12.1%</td>
<td>12.1%</td>
<td>11.7%</td>
<td>11.7%</td>
</tr>
</tbody>
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