

MEMORANDUM

HC
Agenda Item No. 2(A)

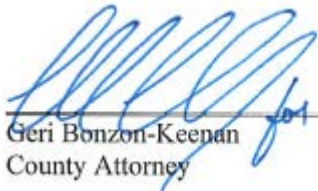
TO: Honorable Chairman Anthony Rodriguez
and Members, Board of County Commissioners

DATE: June 9, 2026

FROM: Geri Bonzon-Keenan
County Attorney

SUBJECT: Resolution directing the County Mayor to provide a written report assessing the methodology utilized by the United States Department of Housing and Urban Development to calculate area median income (AMI) for Miami-Dade County, and potential alternative methods

The accompanying resolution was prepared and placed on the agenda at the request of Prime Sponsor Commissioner Marleine Bastien.



Geri Bonzon-Keenan
County Attorney

GBK/uw

MDC001



MEMORANDUM
(Revised)

TO: Honorable Chairman Anthony Rodriguez
and Members, Board of County Commissioners

DATE: July 21, 2026

FROM: 
Cliff Bonzon-Keenan
County Attorney

SUBJECT: Agenda Item No.

Please note any items checked.

- _____ **“3-Day Rule” for committees applicable if raised**
- _____ **6 weeks required between first reading and public hearing**
- _____ **4 weeks notification to municipal officials required prior to public hearing**
- _____ **Decreases revenues or increases expenditures without balancing budget**
- _____ **Budget required**
- _____ **Statement of fiscal impact required**
- _____ **Statement of social equity required**
- _____ **Ordinance creating a new board requires detailed County Mayor’s report for public hearing**
- _____ **No committee review**
- _____ **Requires more than a majority vote (i.e., 2/3’s present ____, 2/3 membership ____, 3/5’s ____, unanimous ____, majority plus one ____, CDMP 7 votes (majority of membership) ____, CDMP 2/3 members present but not less than 7 votes (majority of membership) ____, CDMP 9 votes (2/3 membership) _____) to approve**
- _____ **Current information regarding funding source, index code and available balance, and available capacity (if debt is contemplated) required**

Approved _____ Mayor

Agenda Item No.

Veto _____

Override _____

RESOLUTION NO. _____

RESOLUTION DIRECTING THE COUNTY MAYOR OR COUNTY MAYOR'S DESIGNEE TO PROVIDE A WRITTEN REPORT ASSESSING THE METHODOLOGY UTILIZED BY THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT TO CALCULATE AREA MEDIAN INCOME (AMI) FOR MIAMI-DADE COUNTY, AND POTENTIAL ALTERNATIVE METHODS

WHEREAS, each year, the United States Department of Housing and Urban Development (HUD) calculates the area median income (AMI) for each county or multicounty metro area; and

WHEREAS, the AMI is used to determine eligibility for many national, state, and local housing programs; and

WHEREAS, for example, the AMI is used to calculate eligibility for the Housing Choice Voucher program (commonly known as the Section 8 program), public housing, and to set income limits and rents for properties financed with low-income housing tax credits and tax-exempt housing bonds; and

WHEREAS, Miami-Dade County specifically utilizes the AMI for programs such as the Infill Housing Initiative, Workforce Housing Administration, Section 8 Housing Choice Voucher, Section 8 Moderate Rehabilitation, Documentary Stamp Surtax, State Housing Initiative Partnerships, HOME Investment Partnership, Community Development Block Grant, and Building Better Communities General Obligation Bond programs; and

WHEREAS, other agencies, such as the Florida Housing Finance Corporation also use the AMI published by HUD for their affordable housing programs; and

WHEREAS, affordable housing developers rely on the AMI to determine which deals may be eligible for various government financing and incentive programs; and

WHEREAS, HUD calculates the AMI based on a metropolitan fair market rent area which is a specific geographic region identified by HUD; and

WHEREAS, according to a 2023 report from the Urban Institute (the “Report”), the calculation for each geographic area is based on the median family income as well as an adjustment for inflation; and

WHEREAS, for each geographic area, HUD utilizes the most recent data available from the Census Bureau’s American Community Survey (“ACS”) for the median family income estimates; and

WHEREAS, according to the Report, HUD typically starts with the ACS one-year estimates, which are more reflective of the local market, but more prone to error; and

WHEREAS, in cases where HUD deems the ACS one-year data unreliable, HUD will use a five-year estimate; and

WHEREAS, because there is a lag between when the ACS data is collected and the fiscal year for which the AMI is applied, HUD applies an inflation adjustment; and

WHEREAS, despite the inflation adjustment, the AMI may still be inaccurate if the incomes for that current year are not growing at the forecasted rate of inflation; and

WHEREAS, there have been efforts to explore alternative methods of calculating the AMI; and

WHEREAS, for example, the Report includes adjusting the AMI by using a wage index, or median weekly earnings data, or considering different time frames and economic conditions; and

WHEREAS, this Board is interested in addressing the housing affordability crisis that is facing Miami-Dade County; and

WHEREAS, Miami-Dade County is part of the “Miami, Miami Beach, and Kendall Fair Market Area;” and

WHEREAS, as of May 2026, the AMI for Miami-Dade County for all families is \$89,800.00, and for a family of four specifically is \$136,200.00; and

WHEREAS, this Board is interested in exploring potential alternatives to calculate the AMI to ensure its accuracy and reliability for housing programs; and

WHEREAS, this Board wishes to direct the County Mayor or County Mayor’s designee to provide a written report on the methodology used by the United States Department of Housing and Urban Development to calculate the AMI for Miami-Dade County, in particular for areas with a high-cost of living or areas with a higher rate of inflation, as well as potential alternative methodologies,

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF MIAMI-DADE COUNTY, FLORIDA, that:

Section 1. The foregoing recitals are incorporated in this resolution and are approved.

Section 2. This Board directs the County Mayor or County Mayor’s designee to provide a written report on the methodology used by the United States Department of Housing and Urban Development (HUD) to calculate the area median income (AMI) for Miami-Dade County and potential alternative methods that the County could implement for its programs. The written report required by this resolution shall include but not be limited to: (a) an assessment of the current methodology used by HUD, including the benefits and shortcomings of using such a method given the economic conditions currently present in the County, and in particular for areas within the

County that may have a higher cost of living; (b) the number of potential low-income, very low-income, and extremely low-income households that may face barriers accessing affordable housing due to the current methodology used by HUD to calculate the AMI for Miami-Dade County; (c) a comparison of the AMI published by HUD for Miami-Dade County and other reliable estimates of the current AMI calculated by other methodologies, broken down by Commission District; and (d) an assessment of alternate methodologies that could be used to calculate the AMI in place of the method currently used by HUD, including by considering the wage index, median weekly earnings data, geographic location and census tract data, different economic conditions and different time frames, including a description of whether and how the alternative strategy could be implemented in Miami-Dade County.

Section 3. For purposes of this resolution, the terms extremely low-, very low-, low-, and moderate-income persons, shall mean as they are defined by the United States Department of Housing and Urban Development or section 420.0004, Florida Statutes.

Section 4. The County Mayor or County Mayor's designee shall provide to this Board the report as required by section 2 of this resolution within 90 days of the effective date of this resolution and place the completed report on an agenda of the full Board without committee review pursuant to rule 5.06(j) of the Board's Rules of Procedure.

The Prime Sponsor of the foregoing resolution is Commissioner Marleine Bastien. It was offered by Commissioner _____, who moved its adoption. The motion was seconded by Commissioner _____ and upon being put to a vote, the vote was as follows:

Anthony Rodriguez, Chairman
Kionne L. McGhee, Vice Chairman
Marleine Bastien
Sen. René García
Roberto J. Gonzalez
Danielle Cohen Higgins
Natalie Milian Orbis
Micky Steinberg
Juan Carlos Bermudez
Oliver G. Gilbert, III
Keon Hardemon
Vicki L. Lopez
Raquel A. Regalado

The Chairperson thereupon declared this resolution duly passed and adopted this 21st day of July, 2026. This resolution shall become effective upon the earlier of (1) 10 days after the date of its adoption unless vetoed by the County Mayor, and if vetoed, shall become effective only upon an override by this Board, or (2) approval by the County Mayor of this resolution and the filing of this approval with the Clerk of the Board.

MIAMI-DADE COUNTY, FLORIDA
BY ITS BOARD OF
COUNTY COMMISSIONERS

JUAN FERNANDEZ-BARQUIN, CLERK

By: _____
Deputy Clerk

Approved by County Attorney as
to form and legal sufficiency.



Melissa M. Gallo