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From: Robert Thomas [REDACTED]
Sent: Monday, November 4, 2019 2:22 PM
To: McMillan, Chris 6-9196; Martinez, Sara 6-4144
Subject: QAP Comment

Chris, Sara: I would like clarification on statements in the 2020 QAP regarding the Reconsideration process. Specifically, located at C 1 on page four this section starts with the statement "The process described in this section is the exclusive means by which an Applicant may request reconsideration of a disqualification and/or a point score." After this statement the QAP then describes the reconsideration process promulgated by the Authority and the last sentence at the end of number 8 states "The process is informal and is not subject to the Administrative Procedures Act." In as much as South Carolina State Housing Finance and Development Authority is a state agency and this document is signed by the Governor, what entity of the State made the determination that your state agency reconsideration process is not subject to the Administrative Procedures Act? As the Low Income Housing Coalition discussed in its comments at number 1 and 3, the use of unbridled administrative discretion seems to violate every basic intent of administrative due process allowed under the law.

Thanks. Robert

Robert Thomas
Executive Director



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