



To: South Carolina State Housing Finance and Development Authority  
From: Kennedy Street Owner, LP

**Subject: Request for Reconsideration – Kennedy Street Apartments Preliminary Score**

Dear SC Housing Review Committee,

We respectfully submit this memorandum to request reconsideration of the Healthcare Amenity scoring for our 2025 9% LIHTC application for Kennedy Street Apartments. We believe our project is eligible for three (3) points under the Healthcare category, and that these points were incorrectly excluded. Please refer to the enclosed exhibit A to see what we submitted under the Healthcare Amenity.

**Background**

Appendix C1 of the 2025 QAP in Section III.A.1 of Appendix C1 to the 2025 QAP defines qualifying healthcare providers as: *“Healthcare - hospital, urgent care, or general/family practice. Does not include medical specialists or a local health department.”*

This language establishes restrictions based on the scope of services provided by excluding medical specialists or local health departments. The QAP does not define “medical specialists”, however; when read in context of the requirements for the Healthcare Amenity, the intention appears to be to exclude clinics that do not provide emergency or general medicine. This language does not impose restrictions based on the form of payment allowed by the clinic under the Healthcare Amenity scoring guidance. Similarly, this language does not impose restrictions based on the typical demographic makeup of a clinic’s patients. In our reading, clinics such as Oak St. Health that serve patients on Medicare should be eligible for points as long as the scope of services includes general medicine.

We were advised *“SC Housing did not award 3 points for Oak St Healthcare as this is for seniors only and the individual must receive medicare”*.

We have several objections to this determination including:

- The determination that Oak St. Healthcare only serves seniors is factually incorrect. Oak Street Health provides general practice healthcare to patients on Medicare but does not exclusively serve seniors. This interpretation is supported by public-facing materials from Oak Street Health show that Oak Street does not exclusively serve seniors and provides general practice medical care. See <https://www.oakstreethhealth.com>, under the “Common Questions” section, which explicitly states: *“Our general practitioners specialize in caring for anyone with Medicare, including Original Medicare Part B, select Medicare Advantage plans, Medicare Supplement or Medigap plans, and Medicare-Medicaid Plans.”*
- Appendix C1 defines qualifying healthcare providers by type (e.g., general/family practice), not by patient demographics or insurance requirements. Therefore, eligibility for points should be based solely on the nature of the healthcare services provided, not on the form of payment accepted or patient demographics as the QAP does not restrict scoring based on insurance status or payer type. Oak St. Health meets the requirements in the QAP because they provide generalized medicine to anyone qualifying under an accepted payment method.
- Appendix C1 requires that all amenities *“..must be open to the general public..”*. The requirement for a patient to be a medicare recipient is not arbitrary but based on participation in a federal healthcare program with broad public enrollment. This regulatory alignment is fundamentally different from a clinic that could

accept other insurers but choose not to. While Oak Street Health serves Medicare-eligible patients, this does not make it materially different from other healthcare providers whose access is shaped by insurance eligibility, contractual networks, or regulatory frameworks that similarly use a criterion to determine which members of the public are eligible for service. Put differently, if private-insurance-only clinics qualify, then so should Oak Street Health.

We appreciate your time and consideration and are available to provide any further documentation or clarification as needed.

Sincerely,

A handwritten signature in blue ink, appearing to read 'SWILSON'.

Name: Stephen Wilson,

Title: Managing Member of Kennedy Street Owner, LP



## Healthcare

Name: Oak St. Health Primary Care

Address: 550 S. Church Street, Spartanburg, SC 29302

Distance from Site: 0.9 miles

Driving Map:

← from Kennedy Street Parking Garage, E Kenned...  
to Oak Street Health Spartanburg Primary Care ...

**3 min (0.9 mile)**  
via S Church St  
Fastest route, the usual traffic

**Kennedy Street Parking Garage**  
E Kennedy St, Spartanburg, SC 29306

- ↑ Head west on S 1767/E Kennedy St toward S Liberty St  
0.2 mi
- ↩ Turn left onto S Church St  
0.6 mi
- ↪ Turn right onto Milster St  
164 ft
- ↩ Turn left  
Destination will be on the right  
404 ft

**Oak Street Health Spartanburg Primary Care Clinic**  
550 S Church St #4, Spartanburg, SC 29306



Photo:





