



Comments on 2025 Draft QAP:

- Bring back a true Nonprofit set-aside. Require that nonprofits have 100% ownership of general partners or equivalent in llc. One way to allow housing authority participation without a separate set-aside is to increase amount of funding in the nonprofit set-aside and recognize housing authorities as nonprofits. Within this set-aside, eliminate the three full-time staff requirements. South Carolina Housing Authorities often establish “affiliates” or “instrumentalities” when developing new housing and these nonprofits do not necessarily have full time staff. The amount of funding in this pool should be adequate enough to potentially fund regular nonprofit deals as well as those of housing authorities. Limit housing authority nonprofit deals to be only in the housing authority service area.
- Develop criteria that levels the experience playing field and gives recognition of experience that SC Public Housing Authorities and/or their affiliates have in multifamily housing. Housing Authorities should be able to participate even though they may not have past LIHTC deal experience.
- For Rehabilitation Projects: Consider giving preference for having rental assistance period and not just to those projects with contracts with remaining terms of three years or less. Most project-based rental assistance contracts are renewed and the three year period is often just a function of the last time a renewal took place.
- For Rehabilitation Projects: Consider eliminating the qualified contract criteria altogether. This past year enabled any former tax credit project from 1995 to 2010 to get the points. Deals placed in service just 15 years ago should not need rehabs this soon at the expense of more needy projects needing rehab. If it is not eliminated, only give points to developments that were placed in service 20 years ago or sooner and allow existing developments that have never received credits to receive more points or the same amount of points.
- For Rehabilitation projects: Developments located in Rural Development rural areas whether or not they have Rural Development financing should get more points than non-rural areas. The new construction point criteria for number of jobs paying criteria effectively eliminates rural new construction deals.

Thank you for the opportunity to comment.

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