



October 21, 2025

South Carolina State Housing Finance and Development Authority
Attention: Kim Wilbourne, Multifamily Development Director
300-C Outlet Pointe Boulevard
Columbia, South Carolina 29210

Re: Comment for Future QAP Development – Information Regarding Resident Services

Dear Ms. Wilbourne and SC Housing Leadership,

Rainbow Housing Assistance Corporation ("Rainbow") respectfully submits this comment for consideration in future Qualified Allocation Plan development. We commend SC Housing for its leadership in expanding access to quality affordable housing across South Carolina and for your commitment to serving the state's most vulnerable populations. The 2026 QAP demonstrates thoughtful attention to development quality, site suitability, and financial sustainability.

We write today to share recent research and resident outcomes that may be of interest to SC Housing as you contemplate future QAP development. Our intent is simply to provide information that could inform your ongoing work, should you find it useful.

The Research: A Documented Need Beyond Affordability

Recent research from Harvard University's Joint Center for Housing Studies, "The Rent Eats More: Residual Income Housing Cost Burdens from 2019-2023" (September 2025), provides important insights into the challenges facing affordable housing residents. The study found that 74% of renter households in South Carolina face what researchers term "residual income cost burdens," meaning that even when housing costs meet the standard 30% affordability threshold, residents cannot afford basic necessities like transportation, healthcare, food, and childcare after paying rent.

This research validates what we observe across our communities: a household earning \$35,000 annually might pay \$875 in rent (perfectly affordable at 30% of income), yet still come up \$11,000 short of covering their family's basic needs for the year. This gap between housing affordability and true financial stability affects working families, seniors on fixed incomes, and individuals striving for independence.

We share this data not to advocate for any particular policy approach, but simply to provide context about the documented challenges that affordable housing residents face beyond securing shelter.

The Reality: Success Stories from South Carolina and Beyond

The potential impact of coordinated resident services extends across diverse populations and circumstances. Among the residents Rainbow serves, we see examples of how structured support can create meaningful outcomes:

Holiday Support (Friendship Court, South Carolina): A resident learned about the Operation Santa program through shared information and guidance, applied, and was selected to receive a special gift box. This simple yet impactful gesture not only brightened the family's holiday but also highlighted the power of connecting residents with programs that make a difference.

Senior Resource Connection (Newberry Arms, South Carolina): Through coordination efforts, our team established a partnership with Meals on Wheels that has become a valuable resource for seniors. The program agreed to provide an informative presentation at the site, offering seniors insights into their services. Additionally, they assisted seniors with on-site enrollment, ensuring easy access to nutritious meals and support tailored to their needs. This partnership represents a meaningful step toward enhancing resources for the senior community.

Crisis Intervention (National Portfolio Example): A single mother facing a high-risk pregnancy had been hospitalized for two months, leaving her \$1,775 behind on rent and facing eviction. Through persistent coordination with five local faith-based organizations, provision of financial literacy classes, and ongoing case management support, she secured full rental and utility assistance plus essential baby supplies. Today, she describes the experience as life-changing: "I have two younger children at home and I am a single mother so I was extremely thankful and grateful. This is a wonderful program who will stop at nothing until the job is complete. I truly feel blessed."

These examples illustrate different models of support, from simple information sharing to comprehensive case management, all of which address the residual income gaps the Harvard research documents.

Information for Future Consideration

Rainbow operates properties across 24 states and has witnessed a range of approaches to resident services within QAP frameworks. Some states have chosen to recognize resident

services through various mechanisms, while others have taken different paths. Each state's approach reflects its unique housing landscape, developer community, and policy priorities.

Should SC Housing wish to explore this topic in future QAP development, we would be honored to share:

- Data and outcomes from our national portfolio demonstrating measurable impacts on housing stability, resident satisfaction, and property performance.
- Information about flexible implementation models that allow developers to determine appropriate service levels based on property type, location, and resident population.
- Examples of how other states have approached this topic in ways that align with their existing QAP frameworks and development community preferences.
- Best practices for partnership development with local service providers, which can enhance community connections without requiring significant infrastructure investment.

Our Commitment

Rainbow stands ready to serve as a resource should SC Housing have questions about resident services implementation, outcomes measurement, or flexible approaches that respect developer autonomy and local market conditions. We recognize that any consideration of resident services must fit within South Carolina's unique affordable housing landscape and respect the expertise of your development community.

The Harvard research confirms that 74% of South Carolina families in affordable housing face documented barriers to meeting basic needs even when rent is affordable. Coordinated services, whether through formal programs or simple resource connections, can help bridge this gap. We share this information with deep respect for SC Housing's thoughtful approach to QAP development and your ongoing commitment to South Carolina residents.

Thank you for your continued leadership and for your consideration of this information. Your work reflects a genuine commitment to ensuring that affordable housing creates opportunity and stability for South Carolina families, seniors, and individuals. We welcome any future discussions that might be helpful.

Respectfully submitted,
Patti Adams



Multifamily Impact Manager