

## 2026 QAP Comments

### 4% Comments

1. Public Housing Authorities should have their own set aside, separate from other Rehabilitation projects. If the PHA set aside is unused (or has no applications), it should be collapsed into the Rehabilitation set aside.
2. We applaud and appreciate many of the processes on the application updates, particularly the construction information requests.
3. Please consider explicitly permitting developers to utilize cash flow during construction as a project source. This is very common elsewhere.
4. Please consider including application dates (or months) within the QAP's final version.

### 9% Comments

1. Rehab size limits – Appendix C-1, Section III.D “*Rehabilitation developments may not consist of more than 100 units*”. We encourage SC Housing return the language to how it appeared prior to 2025. In 2024 and prior years, there was no size limit on rehabilitation developments (2021-2024). We recommend removing the size limit for rehabs. This is a benefit to residents at properties that are over 100 units. Or the QAP could modify the language to say ‘may not consist of more than 100 **LIHTC** units’. Many older properties have HUD subsidies, PBV and other mechanisms that could cover other types of non-LIHTC units.
2. Same as #4 above.