Affordable HousingSC
AFFORDABLE HOUSING COALITION OF SOUTH CAROLINA

Kim Wilbourne
South Carolina State Housing Finance and Development Authority (SC Housing)
300-C Outlet Pointe Boulevard
Columbia, SC 29210

Re: 2027 Qualified Allocation Plan (QAP) Comments

Dear Kim:

On behalf of the Affordable Housing Coalition of South Carolina (AHCSC), thank you for the opportunity to provide comments on the proposed 2027 Qualified Allocation Plan (QAP) and related appendices. We appreciate the opportunity for members of our QAP Committee to review the proposed changes. Following our review, we identified a number of specific provisions for consideration. Rather than focus this letter on individual technical changes, we want to elevate several broader issues that we believe have implications for a wide range of stakeholders and for the overall effectiveness, transparency, and predictability of the allocation process.

The proposed changes to the waiver process are an area of concern. We believe applicants should have a clear understanding of the requirements and scoring criteria before submitting an application, and that exceptions to those requirements should be narrowly defined, consistently applied, and transparent. In particular, we encourage SC Housing to maintain clear deadlines for waiver requests, establish clear parameters regarding which provisions may be waived, and publish approved waivers promptly. A transparent waiver process helps ensure that all applicants are operating under the same expectations and reduces the potential for material changes after applications have been submitted or awards have been made.

We also ask you to reconsider several proposed scoring and program requirements that we believe could affect accountability and the allocation process. Specifically, we recommend that the negative point for each incorrect distance or amenity remain in place to promote accuracy in applications; that the negative points associated with qualified contracts be removed from both programs; and that the proposed Brownfields tax credit points be removed.

We encourage you to continue recognizing the differences between new construction and rehabilitation when establishing design, site, and development requirements. Rehabilitation projects often involve existing buildings, infrastructure, occupied properties, and site conditions that are fundamentally different from new construction. Requirements that may be straightforward for a new development can create significant challenges or unintended costs when applied to an existing property.

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We ask that you review the proposed requirements from a rehabilitation perspective and ensure that the final QAP provides flexibility where existing conditions warrant it, while maintaining appropriate standards for quality, safety, accessibility, and long-term viability.

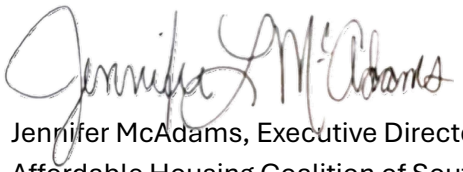
The 9% and bond programs serve different roles in meeting South Carolina's affordable housing needs, and we encourage SC Housing to consider how the requirements and priorities of each program can best complement one another. We believe there is value in having complementary tools within the state's affordable housing financing system. The 9% program provides an important source of equity for developments serving households at deeper levels of affordability, while the bond program can play an important role in addressing workforce and moderate-income housing needs across a broader range of communities.

We encourage SC Housing to consider whether the proposed affordability requirements, income-averaging provisions, supportive housing requirements, and other priorities are consistent with the intended role of the bond program. We believe this broader policy question warrants discussion as SC Housing considers how the 9% and bond programs can work together to address the full range of housing needs across South Carolina.

We recognize that developing the QAP requires you to balance many competing priorities and that there will not always be a single approach that meets the needs of every stakeholder or development type. Our intent is to elevate the issues that we believe warrant broader discussion across the affordable housing community.

Thank you for considering our comments and for your continued engagement with stakeholders across South Carolina. We would be happy to provide a more detailed, page-by-page summary of our committee's comments, including the specific sections and recommendations, if that would be helpful. We look forward to working collaboratively with SC Housing to support a transparent, predictable, and effective allocation process that helps expand and preserve affordable housing throughout the state.

Sincerely,



Jennifer McAdams, Executive Director
Affordable Housing Coalition of South Carolina (AHCSC)

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