Wilbourne, Kim 9083

From: Drew Schaumber [redacted]
Sent: Tuesday, July 21, 2026 10:19 AM
To: Taxcreditquestions
Subject: [External] 2027 QAP Comments

1. Distance to amenities in the urban pool was reduced to 1 mile. This reduced distance will eliminate sites in rural areas within the urban counties. I would suggest allowing the suburban or rural distance for sites within USDA designated rural areas even if the site is within an urban county. The application would still compete in the urban pool but the site score for amenities would have looser restrictions on distances.

2. Noncompliance - the negative points for having a related "management entity" in an application and that management entity having an uncorrected 8823 needs to be removed. We use third party property management, who manage for different owners/operators. An 8823 for one owner can't kill an application for a different owner because if a related management company.

3. GP Loans should not give an application a more competitive edge than a deal without a GP loan. Larger, vertically-integrated owners/operators are buying deals and eliminating competition. If the scoring changes these groups will immediately eliminate the GP loans. There is a distinction between private groups doing this and government agencies/housing authorities.

4. I support adding additional points, amenities, etc to the site scoring to reduce the chances of tie-breakers or allowing a singular item/score to drive the competition.

5. Affordability Negative Points - The negative points on the “seller” for selling/transferring an asset where the new owner submits a QC within 5 years needs to be removed. We can’t control what a new buyer does with an asset. SC Housing has not provided any financial assistance to help keep a property affordable for years 15 - 30 other than a resyndication which is extremely difficult. Most deals at year 15 have a minimum need of $10,000 - $15,000 (resident HVACs, water heaters, plumbing fixtures, appliances, etc) per unit just to keep the apartment unit habitable beyond year 15. SC Housing can help existing owners with older properties, especially those that are not competitive for resyndication, by aiding for these older deals through the extended use period.

6. All waiver requests should be put on SC Housing website as soon as submitted (redacted as needed) and once authority addresses the waiver, that response should be posted as well.

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