

2027 QAP Comments

General Comments:

1. Developer fee caps should be inclusive of any interest on deferred developer fee. Example, when interest is charged on deferred developer fee it cannot be added on top of the max developer fee allowed.
2. Qualified Contract – Language on application form needs to change. Can not penalize someone for doing a QC on a past deal.
3. Waivers – How are they approved? Needs to be made Public. Should be handled by committee that includes at least one Board Member or Board must approve
4. Caps & Floors on syndication, or point score based on standard deviation. It is not realistic to think that syndication rates are as high as 70 cents on State Credits.

TEB:

1. Any loans, grants or equity from any entities that have related party should be considered as part of deferred developer fee and restrict combined total to 50% of total developer fee. Why would SC Housing cap reinvestment income, (which is a legitimate and recognized source of funds in the industry) to 50% of the developer fee but not GP Equity loans (which is essentially redirecting developer fees or cash back into a deal to “buy” the deal under the current scoring criteria)? Further, the 9% program requires “Funding or Financial support- Must be from a third party not affiliated with any member of the development team.” When the 9% program is scored on other weighted items than financial but the 4% TEB program is strictly scored based on financial weighted items?
2. Need clarification on portfolio deals, need to strike the words acquisition / Rehab. Why does a portfolio deal have to be an acquisition rehab? C2-2

9%

1. I would also suggest that we revise the amenity points be raised from the current max 70 points to a maximum of 75 points. This was in one of the 2026 draft QAP's, but was revised back to 70 prior to the final QAP. This would significantly reduce the number of amenity scores that tie and put a priority on the things that bring a direct benefit to the tenants and what matter most is the proximity to amenities.

Consider leaving the 70 point maximum in the Rural set aside, but raising the urban and suburban points to 75. Many rural counties do not have double services, but pretty much every urban and suburban county does.

2. Attorney opinion required that a development qualifies for the “other credits”.
3. Eliminate points for Brownsfield Credits as it is incentivizing developers to find and utilize contaminated sites.