dhic
HOME TO OPPORTUNITY

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NCHFA
Low Income Housing Tax Credit Program
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Thank you again for the one-on-one listening sessions earlier this year. DHIC offers the following comments on the draft 2017 QAP.

What we like:

- The revisions to amenity scoring although we do think that the vast majority of applicants will receive the maximum scoring.
- The new tiebreakers, although we didn't see them coming into play much during 2016.

Revisions that we suggest are:

- Amenities: Increase the maximum score.
- Development Cost limits: Increase the metro cost limits by at least $4,000. There is a shortage of labor and a vast amount of new construction going in metro regions. We feel that the cap for all regions should be increased as well.
- Rent affordability: We like the concept of rewarding applicants that offer deeper income targeting but we think 35% of the units at 30% AMI is too deep for metro projects. We suggest that no more than 25% of the apartments should be targeted to very low income households.
- Credits per unit average: We think that this is where most of the funding decisions will be determined. Given that applicants won't know what other applicants will be submitting or what standard we need to meet, it will be a guessing game for most applicants. It will feel like a lottery.
- Removal of limit on credits that can be awarded to non-profit sponsors (II,D,2)
- More guidance on the change request process; some projects change a fair amount as the development process progresses and it would seem like an administrative burden (on both sides) to submit change requests multiple times/frequently/for every change.