

Draft 2022 Qualified Allocation Plan Public Hearing Comment Summary

October 27, 2021
Held virtually via GoToMeeting

Comments are listed in the order made. This document is not a transcript but rather a summary of the speakers' main points as noted by NCHFA staff. Not all comments are listed. Please contact Tara Hall with questions about your remarks (tshall@nchfa.com).

Michael Rodgers

Design requirements-restated written comments which are published in the 2022 QAP section of our website

Jennifer Lampman

Expressed income averaging election as a concern with investors due to IRS acknowledging potential problems with original guidance. This is impacting not only awarded projects but also several industry peers. They are finding it increasingly difficult to find investors who support the income averaging, including multi-investor funds. Asking that the Agency provide some sort of option to developers to switch from income averaging to 40/60.

Richard Angino

Credits per unit is just as reasonable as any other number picked. It summarizes how efficient the units are constructed.

Suggested to explore QAP and Appendix B on how costs can be kept down on tax credit properties and can't afford to be made bigger and expensive; supports showers, as many elderly struggle with bathtubs but allow for the same design size, 32"x58" for either tubs or showers.

Jaymar Joseph

Restated written comments provided by Greensboro Housing Authority which are published in the 2022 QAP section of our website

Requested increase in redevelopment set aside from two to three developments. Suggested that once a project has been awarded through the county or region, it would no longer eligible for the redevelopment category.

Michael Rodgers

Restated written comments provided by DHIC which are published in the 2022 QAP section of our website.

Joseph Kas

Restated written comments provided by NHE, Inc. which are published in the 2022 QAP section of our website.

Alternately, establish a floor using last year's application numbers or placed in service numbers or other appropriate calculation to set a floor below which deals would not be considered.

David Levy

Restated written comments provided by AHM which are published in the 2022 QAP section of our website.

Suggested tiebreakers return to the project with census tract with lowest poverty rate or the project closest to primary amenities; Development costs per unit limit should increase.

Design requirements-restated written comments which are published in the 2022 QAP section of our web site; Requested NCHFA parking requirements be tied to local municipality requirements. In Greensboro the NCHFA requirements are stricter.

Thomas Urquhart

Requested elimination of income averaging. By leaving income averaging and lowest tax credits per unit, it will force everyone to use income averaging in order to generate more revenue, support more debt, and request less credits.

Recommend that we take tiebreaker as average rent requested, and change other sections of QAP to set minimum and max expenses and interest rates, etc.; units are "too finely designed" and expensive which reduces units unless Congress and the President acts to increase the number of credits.

Liz Ward

Restated written comments provided by Give Impact which are published in the 2022 QAP section of our website.

Recommend other tiebreakers in written comments that will not result to a "race to the bottom" concept; recommend developing other scoring solutions.

Jennifer Lampman

Supports comments including Joseph Kas' suggestions on lowest tax credit per unit. There are ways that can be achieved if developers identify other sources and soft funds that can support strong financing. One method that could be helpful would be to calculate soft funds as an equivalent metric to an average tax credit or identify a floor to prohibit race to the bottom.

Recommend development cost per unit should increase; allow one bonus point per project as a ceiling.

Brian Flanagan

Recommend the removal of the income averaging irrevocable set aside language and allow deals to elect a different set aside.

Richard Angino

Recommend to remove income averaging as an option if guidance is not clarified by the IRS by the application period; another option is to require rents not to exceed 60% AMI.

Geoffrey Barton

Restated written comments provided by MHO which are published in the 2022 QAP section of our website.

Steve Napolitano

Recommend not making income averaging a mandatory election due to limiting amount of capital on deals.

Michael Rodgers, commenting for Natalie at DHIC

Agree with income averaging concerns; recommend changing language from “capacity” to “availability” for water and sewer letters.