

September 19, 2023

North Carolina Housing Finance Agency 3508 Bush Street Raleigh, NC 27609

Re: First Draft 2024 QAP

To Whom it May Concern:

Please see the below comments on the first draft QAP for 2023:

**Site Evaluation** – we appreciate the increase in allowable points for the Secondary Amenities located near prospective sites. We know that the current scoring system has all-too-often resulted in the need to use the second and sometimes third tiebreakers to determine which projects will get awarded and we hope that this modified scoring system will allow for a wider range of site scores which will better reflect those sites which are indeed better suited for our residents. We appreciate that the proposed change is clear, objective, and fair to all parties. It is our hope that this change in scoring will help prevent situations such as this year where decisions made during the application process significantly affected the outcome of the awards.

**Second tiebreaker** – upon first reading it appears that using the lowest percentage of agency awarded funding as the second tiebreaker would almost entirely eliminate any requests for RPP or WHLP funding. Additionally, it would seem to be counterproductive to introduce a new funding source through the Golden LEAF Affordable Workforce Housing Initiative while also employing a tiebreaker that could potentially curb application for such funds.

**Third tiebreaker** – while the QAP does give the application deadline for preliminary and final submission, will the agency be providing advance notice of when the application will open for submission?

As always, we appreciate all that the agency does to support affordable housing in North Carolina and we thank all of you for your efforts each year to make the application and awards process as fair and efficient as possible.

Sincerely,

Murray O. Duggins, Jr.

**Broker-Owner**