AHFA 2017 Draft Low-Income Housing Credit Qualified Allocation and HOME Action Plans
Public Comment Form
Commenting Period October 11, 2016 – November 10, 2016

All comments regarding the Draft Plans must be submitted using this form. General Comments may be submitted at the bottom of the form. ***Comments which include cut-and paste text (or redlined/re-worded sections) of the proposed Plans will be rejected.*** *AHFA will not respond (or seek to interpret) to suggested change in language without a complete explanation of the suggested language change.* Please provide full explanatory and careful comments regarding your proposed changes, keeping in mind that your proposed changes might have an unintended consequence for a different project or location in the state. All forms should be submitted to ahfa.mf.qap@ahfa.com as an attachment to the email. Other documentation, e.g., product information or photos, may also be submitted. Upon close of the commenting period, all comments will be posted at www.ahfa.com for review.

Select Date Submitted

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Plan Section	Section Reference	Page #	Specific Comments
Plan HOME	Section C. 9.	16	We strongly support the section of the HOME QAP that allows CHDOs to provide housing in Participating Jurisdictions that have their own HOME funds. CHDOs, by federal regulation, must serve a defined service area. They cannot, unlike private developers, choose the counties they will serve based on where they can earn the most points. This means that CHDOs that operate in urban communtiies were previously in ineligible to apply for state HOME funds to develop much needed projects in these communities . Alabama has a very limited number of CHDOs that have the full-time staff , development capacity and financial strength to develop affordable housing using HOME funds and tax credits. Some of these well-qualified CHDOs are limited, by their mission and by-laws, to serving Participating Jurisdictions. By allowing these well-qualified CHDOs to apply for state HOME funds, and develop housing in Participating Jurisdictions, AHFA increases the liklihood it will receive strong CHDO applications. Futhermore, this decision will not negatively impact private developers since the state's CHDO setaside amount, 15% of the total HOME funds, is not being increased.
Plan AHFA CHDO Certification Application	Section Board Composition	3	Our service area includes the 33 counties where we are providing services for homeless and low-income residents including job training programs for homeless veterans, treatment services for individuals with substance use disorders, HIV prevention and support services for individuals living with, or at high risk for, HIV infection and substance use prevention services for low-income youth. Many of the individuals we serve need affordable housing, and we see our

			mission as a Community Housing Development Organization to seek to develop housing that addresses their needs. We do not have a separate CHDO service area that is different from our organizational service area since we believe that integrating housing and services often produces positive outcomes for low-income individuals in greatest need. The HUD training manual for CHDO's, Building HOME, states on Page 3-5 that "The board need NOT include low-income residents from each county in the multi-county area". The AHFA CHDO application states on Page 3 that at least one Board member must live in the service area. If this means at least one Board member must live in our 33-county service area, we support this requirement . However, AHFA intends to require that a Board have a least one member from each county in its service area, we would oppose this requirement since it is inconsistent with the HUD guideline. It would also be impossible for us to meet since we serve 33 counties and our by-laws authorize a maximum of 21 members.
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NOTES

- There are three ways to meet this requirement:

  1. Residents of low-income neighborhoods in the community.

     - ✓ Low-income neighborhoods are defined as neighborhoods where 51 percent or more of the residents are low-income.
     - ✓ Residents of low-income neighborhoods on CHDO boards do ***not*** have to be low-income themselves.

     and/or

  2. Low-income residents of the community.

     - ✓ In urban areas, "community" is not necessarily limited to a single neighborhood, but may include several neighborhoods, the city, county or metropolitan area.
     - ✓ In rural areas, "community" may also cover a multi-county area (but not the whole state). The board need ***not*** include low-income residents from each county in the multi-county area.
     - ✓ Low-income residents of low-income neighborhoods in the community ***do not*** need to submit proof of their income.
     - ✓ If low-income residents of the community who do not live in low-income neighborhoods are necessary to meet this threshold, the CHDO must obtain a certification from the resident that the resident does qualify as low-income. No PJ verification of the CHDO certification of income is required.

     and/or

  3. Elected representatives of low-income neighborhood organizations.

     - ✓ A ***low-income neighborhood organization*** is an organization composed primarily of residents of a low-income neighborhood.
     - ✓ The primary purpose of the organization must be to serve the interests of the neighborhood residents.
     - ✓ Block groups, town watch organizations, civic associations, neighborhood church groups and NeighborWorks® organizations can be examples of low-income neighborhood organizations.