

AHFA 2021 Draft HOME Action Plan, Low-Income Housing Credit Qualified Allocation Plan,  
and National Housing Trust Fund Allocation Plan  
Public Comment Form  
Commenting Period July 2, 2020 – August 20, 2020

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.gap@ahfa.com](mailto:ahfa.mf.gap@ahfa.com) as an attachment to the email. Other documentation, e.g., product information or photos, may also be submitted. All comments will be posted at [www.ahfa.com](http://www.ahfa.com) for review.

8/20/2020

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Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	Point Scoring	A-7	Expiring HOME projects should be awarded points even if they are unable to paydown the required 30%, so long as the development can demonstrate it's inability to pay the full 30%. The point scoring for this category should be tiered so that you obtain points for 10%, 20%, and 30% paydowns. This is particularly important in very rural areas where HOME funds were used as a means to get the rents low enough for the population to be able to afford them. Most of these areas have not seen significant economic growth and in a lot cases have actually seen a decrease in economic growth, population growth, etc. This would allow HOME projects that are not as cash flush to still be able to compete.
Housing Credit	Point Scoring	A-7	The points for project services should be expanded and/or different criteria should be used for expiring HOME projects. The services that are given points now, were not the same as when these developments were initially constructed. In order for these projects to have an even playing field, they should be allowed to obtain points for other services that may be available. In rural parts of the state in particular, a full service grocery store, hospital or doctor's office may not be available and sometimes are even located in the next closest bigger town. Allowing expiring HOME projects to gain service points for stores like Dollar General, Family Dollar or other like services would help these projects to receive a higher score and be more likely to receive funding.
Plan	Section	A-6	A maximum of 3 points are currently available to projects that have a commitment for new funds coming from a Capital Fund Program, Public Housing Sales Proceeds, and/or HUD Replacement Housing Factor Funds. For PHAs that have already converted to RAD, any balance available in those funds would be drawn down and deposited in a Replacement

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