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](mailto:ahfa.mf.qap@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 for review.

8/14/2020

Name: Cynthia Prater Organization: The Bennett Group Email: cindy@thebennettgrp.net Phone: 334-758-8404

|  |  |  |  |
| --- | --- | --- | --- |
| **Plan Section** | **Section Reference** | **Page #** | **Specific Comments** |
| Housing Credit | Point Scoring | A-7 | The draft QAP currently indicates that 6 points will be awarded for a proposed project that has closed a 15-year extension of the project's original AHFA HOME loan. To even obtain a 15-year extension, projects are currently required to pay down 30% of the their original AHFA HOME loan. Unforutunately, not all of these projects have (or are able to obtain) the funds necessary for said paydown as they are located in rural areas that have seen little to no economic growth since they were initially constructed. Expiring/expired AHFA HOME loan developments should be allowed to apply for a 15-year extension with less than a 30% paydown if they are able to provide AHFA with documentation indicating what percentage they can afford. Points awarded for closing a 15-year extension could then be scaled based on the percentage of paydown, i.e., 4 points for a 10% paydown, 5 points for a 20% paydown, and 6 points for a 30% paydown. |
| Housing Credit | Point Scoring | 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 Reserve account (to comply with the RAD PBV requirements). If a PHA is able to utilize those reserve funds to renovate existing housing or development new housing, AHFA should incentivize them to do so with an equal award of points. At a minimum, AHFA should allow PHAs to provide evidence that the reserves were obtained from 1 of the 3 named sources and award points accordingly. |
| Housing Credit | Point Scoring | A-7 | Expiring/Expired AHFA HOME loan projects that have closed a 15-year extension and are applying for a new allocation of LIHTCs should have a separate point scoring criteria for neighborhood services. Depending on the age of the project, services currently receiving points weren't a consideration for funding when they were initially proposed/funded. Unfortunately, in the more rural areas of our state, AHFA financed projects were built in communities that still may not have a full service grocery store, hospital, or doctor's office. In those instances, we'd like to see AHFA give some consideration to the services that are available, i.e., Dollar General, Family Dollar, etc. Perhaps providing less points for these types of services, but not discounting them completely. |
| Housing Credit | Point Scoring | A-7 | AHFA should include detailed descriptions of each of the neighborhood services for which they will award points. Currently, these descriptions are only noted on the Site/Project Information Form (Neighborhood Services). When seeking sites for development, individuals may not always have access to the forms package. Having all details and instructions located in one document would certainly be helpful. |
| Housing Credit | Point Scoring | A-7 | AHFA should include a notation in the QAP that provides a list of neighborhood services that aren't awarded points but are required as part of the online application, i.e., Church, Civic Center, Daycare, Dry Cleaner, Library, Park, School, etc. This would be helpful information for individuals seeking sites for development. If AHFA doesn't require these services to be identified by name and distance from a proposed site, they should be removed from the online application. |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |
| Plan | Section |  |  |