

AHFA 2022 Draft Low-Income Housing Credit Qualified Allocation Plan, HOME Action Plan,  
and National Housing Trust Fund Allocation Plan  
Public Comment Form  
Commenting Period July 28, 2021 – August 27, 2021

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.

Select Date Submitted

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Plan Section	Section Reference	Page #	Specific Comments
HOME	Point Scoring	A-6	We strongly object to the plan to provide extra points to projects that provide matching contributions. Under this plan, a developer would be required to provide \$600,000 in equity to receive 5 points on a \$12,000,000 project. This unfairly discriminates against nonprofit developers, including CHDOs, that do not have this amount of available cash and favors very wealthy private developers. If these points remain in the plan, nonprofit developers, including CHDOs, should automatically receive five points or have some other alternative method available to them to earn five points.
Housing Credit	Point Scoring	A-6	We strongly object to the plan to provide extra points to projects that provide matching contributions. Under this plan, a developer would be required to provide \$600,000 in equity to receive 5 points on a \$12,000,000 project. This unfairly discriminates against nonprofit developers that do not have this amount of available cash and favors very wealthy private developers. If these points remain in the plan, nonprofit developers should automatically receive five points or have some other alternative method available to them to earn five points
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