

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 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.

8/24/2021

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Plan Section	Section Reference	Page #	Specific Comments
Housing Credit	II	23	AHFA should consider applying the Housing Credit Cap to developers and guarantors, not just the Ownership Entity. The current language creates a loophole whereby a developer can avoid the credit cap and secure an excessive share of available credits by placing itself in the role of Developer and recruiting a different entity to serve as the Ownership Entity. There doesn't appear to be a limit on the projects a single developer could secure using this approach, which contradicts the purpose of the cap and could add considerable risk to the projects being successfully delivered. AHFA could better meet its stated intent by simply making the caps apply to any "Project Team" member, defined as entities that include the owner, developer, or guarantor of the project.
Housing Credit	Section		
Housing Credit	Point Scoring		
Housing Credit	Point Scoring	A-6	AHFA Matching Contribution section giving 5 points for an equity donation of 5% and donated land puts nonprofits at an extreme disadvantage and may eliminate them entirely. Nonprofits do not have the resources of the for profit developers and contributing this amount of equity may result in nonprofits being unable to obtain financing for their projects. We request this section be removed from the QAP.
Housing Credit	Point Scoring	A-7	AHFA Matching Contribution section as proposed could appear as if developers are purchasing Tax Credits and/or HOME funds based on their financial ability to contribute the monetary resources to the project. Five or ten points on an application would be determinative to who gets funded with the current draft scoring plan. It has also been our understanding that property or equity donated by the applicant for HOME funding is not considered an eligible

