



To: Alan Rakowski, IHCD  
Matt Rayburn, IHCD

From: Ronda Shrewsbury-Weybright, IAHC President

CC: IAHC Membership

Date: January 14, 2019

Re: **2020-2021 QAP Comments**

On behalf of the Indiana Affordable Housing Council (IAHC) Board of Directors and the IAHC Membership, we offer the following comments for the 2020-2021 Qualified Allocation Plan (QAP). The comments and suggestions below are supported by at least 60% of the IAHC members who participated in an online survey. To assist you in the evaluation of these comments, the percentage of favorable support has been provided next to each comment.

Structural Changes

1. Request IHCD to post self-scores of the applicants allowing a time period (a week?) for development teams to consider withdrawing their application and receiving their application fees back? **(Yes - 64%)**
2. Eliminate the requirement of the 150-day letter for allocated developments? **(Yes - 93%)**
3. Eliminate the language “without the need for additional variances” in the submitted zoning documentation? **(Yes - 71%)**
4. Eliminate the requirement for a Rehabilitation/Adaptive Reuse building with elevator to be 100% Accessible/Adaptable? **(Yes - 93%)**
5. Do you believe the current developer fee cap calculation puts Indiana deals at a comparative disadvantage to similarly situated deals across the country? **(Yes - 64%)**
6. Increase the developer fee cap calculations to help increase tax credit pricing? **(Yes - 79%)**



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Scoring Items Recommended to be Eliminated from the QAP

1. Feedback about Historic deals are receiving lower equity pricing, cost more to build and cost more operation dollars. Historic Tax Credits do not offset the challenges. Do you support eliminating the Historic in Nature scoring criteria? **(Yes - 71%)**

Set-Asides

1. Eliminate the Community Integration Set Aside since the population served under the Set Aside is duplicated under the Special Housing Needs list as 'special needs populations' per the State's definition? **(Yes - 77%)**

2. Or instead, make community integration a separate scoring category? **(No - 64%)**

3. Require Income Averaging for the Workforce Housing Set-Aside, provided the Set-Aside is continued in the new QAP? **(Yes - 64%)**

4. Decrease the General Set Aside to 5%? **(Yes - 100%)**

5. Before Moving Forward 4.0 is announced, request that IHCD conduct public meetings to discuss the results/findings of the previous incarnations to jointly determine if the program should continue? **(Yes - 93%)**

6. Request that IHCD conducts discussions with IAHC before determining requirements for future General Set-Asides? **(Yes - 64%)**

Scoring and Other Items to Keep with Suggested Changes

1. Create a second, more relaxed, scoring option for preservation of existing affordable housing rehab developments in meeting the Universal Design Criteria? **(Yes - 79%)**

2. Change the Universal Design requirements from needing to meet a certain number of features from each column to meeting a total number of features from a single list? **(Yes - 86%)**

3. Allow vacant, undeveloped land (but which still meet the current 3 infill attributes per the current QAP) to qualify for 'infill new construction housing' category points? **(Yes - 71%)**

4. Allow vacant, undeveloped land to qualify for 'promotes neighborhood stabilization' category points? **(Yes - 71%)**

5. Decrease of look-back for a disaster/fire/severe storm from 5 years to 3 years? **(Yes - 79%)**



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6. Increase the look back for offsite improvements/investment to 3 years vs 2 years? **(Yes - 79%)**
  7. Do you support the current cost containment scoring of Tax Credit per Unit/Bedroom? **(No - 79%)**
  8. Revise Leveraging Capital Resources scoring criteria to be a percentage of hard costs vs total development costs? **(Yes - 79%)**
  9. Revise the Lease Purchase scoring category to be revised to require that 100% of the units be Lease-Purchase in order to qualify for points? **(Yes - 93%)**
  10. Revise the MBE/WBE/DBE/VOSB/SDVOSB scoring criteria to be a percentage of hard costs vs total development costs? **(Yes - 86%)**
  11. Due to infill site challenges, do you support revising the QAP to permit a designated smoking area to be no closer than 8 feet from an entrance (consistent with Indiana State Law) or operable window? In this case the designated area could be adjacent to a solid face of a building, inoperable windows, and/or a single purpose entry/exit door that serves the designated smoking area. **(Yes - 71%)**

Potential New Concepts

1. Do you feel that Opportunity Zones should **not** be a scoring category in the new QAP **(Yes - 86%)**

Thank you for the opportunity for IAHC to offer these comments. Please let me know if you have any questions or require any clarifications to these comments.

Sincerely,



Ronda Shrewsbury Weybright  
President, IAHC