

- 1. QAP Scheduling and Time Frame** – In order to produce a quality QAP that will better serve the needs of the citizens of South Carolina, the Coalition recommends that the QAP be delayed in order to better discuss and process the feedback from the public hearing and ask for a called meeting of the SCSHFDA Board of Commissioners in December to approve the QAP and refer to the Governor for her signature by December 31, 2013.
- 2. Section V. Reservation/Carry over Allocation Procedures Page 24 of the Manual** - The Coalition recommends that all applications for the 2014 cycle be underwritten at the applicable rate for the month in which the application is submitted.
- 3. Eliminate Tie Breakers of Rents per Heated Square Foot and Eligible Basis per Square Foot** -Rents per heated square foot and eligible basis per square foot should not be the determining factors on which developments are funded and should not be considered as a basis for determining an award. This continued practice will cause harm to existing tax credit properties in the program, will prohibit all tax credit properties from being able to adjust rents to compete in the future and will result in properties either defaulting or being inadequately funded.
- 4. Distance to Services** – The Coalition recommends that the attached chart be incorporated in the criteria on page 4, Section III, and Positive Site Characteristics. Utilizing this distance to services format will help ensure that the developments proposed closest to services that benefit residents will be awarded and will also result in less developments with tied scores.
- 5. Experience Preference - Tie Breaker Criteria** - In order to ensure that the developers that are constructing properties in South Carolina have the level of experience necessary to construct and implement quality properties, the Coalition recommends that preference be given to for profit developers that have developed a minimum of three LIHTC properties in South Carolina from January 1, 2007 to February 1, 2014. In addition, to encourage more development by South Carolina nonprofit developers, the Coalition recommends that preference be given to nonprofits that have had a minimum of one LIHTC development in South Carolina from January 1, 2007 to February 1, 2014.
- 6. Missing or Incomplete Documents** – Tie Breaker Criteria – The Coalition recommends eliminating applications for missing or incomplete documents as this is addressed elsewhere in the QAP and Manual.