



Robert Thomas
Executive Director



Comments on 2023 Draft QAP:

- Bring back a true Nonprofit set-aside with a dollar amount available within this set-aside. A review of North Carolina and Georgia QAPs show both states maintain a nonprofit set-aside. Within this set-aside, eliminate the three full-time staff requirements. South Carolina Housing Authorities often establish “affiliates” or “instrumentalities” when developing new housing and these nonprofits do not necessarily have full time staff. It is possible to be South Carolina based and not have full time employees. Again, North Carolina and Georgia do not have this criterion and it is not required by the Code.
- Keep the required Development Experience at two LIHTC projects in SC or 4 projects from other states. Doubling the requirement is arbitrary and having had issues with developers in the past seems lacking as an explanation. It is easy to say that but hard to attribute issues to not enough experience. Secondly, the concept of having junior developers is/was an opportunity to expand participation. With its elimination and now proposing to expand the experience threshold seems to contradict the idea of increasing participation, and is even further limiting.
- Develop criteria that levels the experience playing field and gives recognition of experience that SC Public Housing Authorities and/or their affiliates have in multifamily housing. SC Housing should be expanding its participation and partnerships with public housing authorities and not have arbitrary barriers for participation.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Robert Thomas".

Robert Thomas
Executive Director