

# Memo

To: Interested Parties  
From: Connecticut Housing Finance Authority  
Date: October 8, 2004  
Re: Proposed Amendment – 2005 Low Income Housing Tax Credit Qualified Allocation Plan

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Attached public comment is an amended 2005 Low Income Housing Tax Credit Qualified Allocation Plan (QAP). Changes to the Compliance Monitoring Plan offered by the Asset Management staff responsible for Compliance Oversight are also included. Proposed changes are summarized below:

## **Changes to Qualified Allocation Plan**

- Page 14 Section 1 V.A.2) adds State PILOTS Supportive Housing program clients , or clients of other supportive housing initiative identified by the Authority, clients as tenants which owners may identify as priority tenants when leasing units at their developments.
- Page 16 Section 1 V.B.7) revises the measure for per unit cost effectiveness, combining the similar measure contained in Section 1.V.D.4), to clarify and simplify this criteria and provide increased equity in the measurement and application of cost effectiveness standards.
- Page 17 Sections 1.V.C.1. and 2. are updated for references to the 2000 Census.
- Page 19 Section 1.V.D.1) clarifies that units must be previously unoccupied in order to be claimed as evidence for these points and proposes that the points awarded may be prorated based on the percentage of new additional units provided if less than all units.
- Page 19 Removes previous Section 1.V.D.2 providing points for applications for housing for which site plan approval at the local level had been obtained at the time of application. This provision encouraged applicants to obtain site plan approval on a schedule driven by the Tax Credit program schedule. Such early approval complicates the sequencing of site plan reviews by other interested parties such as the Authority as a mortgagee and/or other funding parties with an interest.

- Page 19 New language provides 5 points for the development of housing designed to mitigate the asthma and other respiratory conditions. Such standards would be identified by the Authority based on the work of the Asthma Regional Council of New England.
- Page 20 Section 1.V.D.3 adds new language to provide 5 points for the development of housing which provides the infrastructure for high speed internet access in the living space of each unit.
- Page 20 Removes previous Section 1.V.D.4 as this matter is addressed in the revision to Section Section 1 V.B.7) above.

### **Changes to Compliance Monitoring Plan**

- Page 22 Section 4. I  
Par. 1 Added "Authorized Delegate".
- Page 22/23 Par. 2 Revised language related to Compliance Manual and added reference to "Authorized Delegate" Website.
- Page 23 Par. 2 Deleted redundant language. See new Section VIII.  
Par. 3 Changed Section V to VI.  
Par. 4 Changed wording to owner and management agent. Changed timing of pre-occupancy conference to a minimum of 6 months prior to expected place in service date.  
Par. 5 & 6 Deleted language in Par. 6. Revised language included in new Section 4. II. and Section 4. VIII.
- Page 23 Section 4. II  
  
Based on recent experience, added new stand alone Management Experience section to reflect more new stringent language concerning management experience and continuing education.
- Page 24 Section 4. III
- Page 25 Section number(s) modified to accommodate new Section II.  
B. Added (21 years).  
C. Added "and submit copies with the annual certification."
- Page 28,29,30 Section 4. IV.  
Section number(s) modified.  
Par. B1 – Section III.A changed to IV.A  
Par. B.1.b. replaced with original signature with executed by the Authority.  
Added new Par. B. 1. c. – Continuing education requirement, changed format of a., b., & c., to conform to previous format.  
B.4.a and b. added (or a minimum of three (3)).  
B. 5.a – Changed Section III.B.4 to IV.B.4
- Page 31 Section V.  
Changed Section number and removed period (format)  
  
Section 4. VI.  
Section number changed to VI and removed period (format)  
Par. A. Section V. to VI.  
Par. B. Section III.A to IV.A.

Page 32 Added new Par. D. Additional Review Policy language. Due to impact of IRS Regulations and owner noncompliance, workload has increased. This additional work is not part of the Spectrum Contract. Owners will be charged for corrective action requests made after the end of the correction period.

Page 33 Section VII.  
Section number modified to accommodate new Section II. No language change.

Section VIII.

Section number modified.

Par. A. Changed LIHTC's to "Credits" were allocated.

Par. B. Revised language delegating compliance monitoring to "Authorized Delegate".

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