Summary of 2013 QAP Written Public Comments

QAP Section	Public Comment	Received From	Response
General Comments			
	Will projects that receive top scores for tax credits also receive highest consideration for gap funding?	Jessica Berzac, Tangerine Development Group	A Project's score under the QAP is independent of its consideration for gap funding.
	Authority Loan Parameters and underwriting guidelines referenced in the QAP are not on the website	Jessica Berzac, Tangerine Development Group Virginia Pace and Larry Pusateri, The Lightengale Group	Documents will be posted as they are available.
	Please publish the dates for the PPAs, Round I and Round II at the same time, by the end of the year.	Virginia Pace and Larry Pusateri, The Lightengale Group	They are posted on the Program Timelines page of the Authority's Website.
	The following items (encouraged through scoring) are contributing to the escalation of construction costs: Prevailing Wage requirements for financing options and project-based vouchers, green sustainability requirements, larger unit sizes, enhanced accessibility, unforeseeable environmental costs associated with urban infill, Chicago suburban communities with higher impact fees and unique design criteria (Crystal Lake impact and utility connection fees are over $20k/unit)	Mike Smith, Pedcor	Thank you for your comment.
	It seems like well-received downstate new construction projects (like 20 duplexes and a community room) have been disadvantaged in this QAP through scoring emphasis on longer rental assistance, veterans housing, and rehab/adaptive reuse. Please help us preserve this type of needed, new construction that fosters a sense of community	George Dinges on behalf of 15 downstate IHC members.	It is the Authority's intention to incentivize an appropriate balance among various Project types and populations across all areas of the State.
	We commend reducing the scoring point scale to 100 points. It is much easier to work with. We encourage IHDA to maintain two application rounds per year.	George Dinges on behalf of 15 downstate IHC members.	Thank you for your comment.
Definitions			
	Restore the full definition of Permanent Supportive Housing from the 2012 QAP so that potential developers will have a better understanding of the supportive housing model.	Betsy Benito and Cindy Thomas, CSH	The QAP definition of Permanent Supportive Housing is specific to the tax credit program.
	The definition currently says that "households with disabilities" are Supportive Housing Populations. Unless IHDA is prioritizing these units for households that have children with disabilities rather than requiring the actual head(s) of household to have disabilities, I recommend revising this phrase. Also, it should be noted that not all persons with disabilities seeking housing need supportive housing; therefore, not all persons with disabilities are supportive housing populations. I recommend revising the definition of Supportive Housing Populations as follows: shall mean households headed by person(s) with any type of disability and households that are homeless or at-risk of homelessness, that need access to supportive services in order to maintain housing.	Tara Peele, IFF	Please see revised definitions.
	We request the QAP definition of supportive housing be modified to include online service delivery. The majority of the population has internet access and 24-7 communication tools reach residents on demand.	Kerry Kirby, 365 Connect	Project Owners and property managers are free to offer online services delivery, however Supportive Housing Populations require services in excess of what can be delivered online.
	Please confirm the definition of Permanent Supportive Housing is no longer age-restricted.	Thomas Monico, Thomas & Thomas	Permanent Supportive Housing is not age-restricted in the 2013 QAP.
	Who can deliver the services outlined under the definition of Elderly Services? Can the owner or manager?	Thomas Monico, Thomas & Thomas	Owners and managers may provide Elderly Services for their tenants, but doing so will not be considered a substitute for a public senior center in neighborhood assets scoring category.
Tax Credit Information			
Discretionary Eligible Basis Boost	The tax credit floating rate is at its lowest in history (7.38% for October 2012). The challenge this represents is that more reliance will be placed on soft financing which is also in scarce supply. We recommend that IHDA automatically boost all projects up to the rate of 9.0% (and allow that rate to be used in the application) to facilitate underwriting and predictability with getting the project to closing as well as making projects financially feasible. Should Congress retain the tax credit rate fix at 9%, this will have no impact on any deal's underwriting	Virginia Pace and Larry Pusateri, The Lightengale Group	The Authority may use the discretionary boost to make a Project financially feasible subsequent to review and approval.
	IHDA has eliminated the boost for AHPAA family projects and for projects serving special needs populations. We believe this boost was helpful in making special needs projects feasible, particularly because special needs projects are generally unable to support any private debt and need the additional equity to make the financing feasible. We recommend reinstating the automatic boost at a minimum for whatever percentage of a project serves the Targeted/ Special Needs units as well as for family AHPAA housing which has overall higher costs due to acquisition, zoning, and impact fees	Virginia Pace and Larry Pusateri, The Lightengale Group Jessica Berzac, Tangerine Development Group	Prior to HERA, the Boost was not available to AHPAA projects. In an effort to manage resources and control for costs, the automatic Boost has been eliminated.
	Restore the 30% eligible basis boost to PSH projects. Removing the boost will reduce the number of developers willing to undertake PSH. Rather than stating the boost is "discretionary," please state criteria for transparency and consistency.	Betsy Benito and Cindy Thomas, CSH	Prior to HERA, the Boost was not available to PSH projects. In an effort to manage resources and control for costs, the automatic Boost has been eliminated.
	Clarify under what under circumstances the Authority plans to use the boost.	Arcy Smith, RichSmith Development	The Authority's use of the Boost may include the management of scarce resources and to ensure financial feasibility.
	The boost is necessary for supportive housing projects that cannot carry hard debt.	Eric Huffman, Over the Rainbow	Other sources of equity and soft debt can be used when hard debt is not an option.
	If applications cannot be submitted with an assumed boost, please state this unequivocally. The current language is unclear whether some developments can still elect to use the boost.	Bruce Schiff and Andrea Traudt, IHC Thomas Monico, Thomas & Thomas	This section of the QAP has been clarified.
	To take away the definitive boost from AHPAA communities and replace it with the uncertainty of "soft" funds significantly increases developer's risk assessment to pursue these projects. Land costs are higher, design expectations are more expensive, PUD process are generally required as high density zoning doesn't exist.	Mike Smith, Pedcor	Prior to HERA, the Boost was not available to AHPAA projects. In an effort to manage resources and control for costs, the automatic Boost has been eliminated.
Maximum Tax Credit Request	We are convinced that setting a limit of $18,500 per tax credit unit will adversely affect the ability of new construction housing serving larger families and new construction supportive housing from being built. When we evaluated our clients' prior projects submitted to IHDA, the only ones that met this threshold were either senior projects or rehab projects (or projects in the City of Chicago which also received significant tax credits or other funding from the City)	Virginia Pace and Larry Pusateri, The Lightengale Group	The limit has been increased.

	Basing the $18,500 limit per tax credit unit on the average allocation over the last three years means half of the deals IHDA funded over that time period would no longer qualify. This cap doesn't vary based on the size of the unit, nor does it factor high cost areas or prevailing wage requirements. Instead, you could use the per unit hard cost limits to calculate caps on a per-bedroom basis, adding a factor for eligible soft costs, financing costs and developer fees. (Construction Cost Cap * Cost Factor for Non-Construction Costs) * Tax Credit Rate. Waivers to these caps should be allowed and projects receiving a basis boost should have the credit cap boosted as well.	Joshua Wilmoth, Full Circle Communities Bruce Schiff and Andrea Traudt, IHC Jim Lutz, RHCDA Tom Suminski, Banner Apartments	The limit has been increased.
	Any new project of ours needs to be new construction to meet the accessibility needs of tenants with severe mobility impairments. Older buildings, even with modifications, are often still too restrictive for reasonable use by someone in a wheelchair. The per unit LIHTC limit of $18,500 make new construction impossible with out limited resources.	Eric Huffman, Over the Rainbow	The limit has been increased.
	Adjust this maximum up to incent larger bedroom apartments and a mix of bedroom sizes. This limit doesn't promote a balanced mix of housing for larger, family-sized units.	MarySue Barrett, MPC	The limit has been increased.
	Please consider amending the limit by set-aside to apply averages more appropriately. Or consider a different cap for new construction vs. rehab. VHDA's QAP is a good example of how other states differentiate credit caps.	Mike Smith, Pedcor	The limit has been increased.
	Please do not apply this limit to projects receiving a basis boost.	George Dinges on behalf of 15 downstate IHC members	The Authority's use of the discretionary basis Boost may result in an allocation in excess of the limit.
Credit Ceiling and Set Asides			
	We believe the changes to the set-asides are appropriate and needed.	Virginia Pace and Larry Pusateri, The Lightengale Group	Thank you for your comment.
	Increasing the credits set-aside for AHPAA communities and leaving non-AHPAA communities the same is not helpful. I have found many non-AHPAA communities are more biased against affordable housing because of economic concerns, not racial bias.	Thomas Monico, Thomas & Thomas	It is the Authority's intention to appropriately balance resource availability to all areas of the State.
	We are opposed to the change in set-asides that will decrease the rural area's allocation by 1.3 million for the benefit of other set-asides. Rural areas have pressing, unmet housing needs and limited community resources.	George Dinges on behalf of 15 downstate IHC members.	It is the Authority's intention to appropriately balance resource availability to all areas of the State.
PPA			
	The draft QAP states that IHDA will take into account if more than 10% of the community/ municipality have any type of IHDA funding. We are unsure why this would be a consideration. In many small towns, there is very little rental stock so IHDA may have a high participation rate. The other QAP criteria about other assisted projects' overall well-being and financial health is already listed as a consideration.	Virginia Pace and Larry Pusateri, The Lightengale Group	IHDA wishes to measure its level of investment in a community and included the 10% provision only as an indicator. IHDA must consider its level of investment in each community and considers the 10% threshold a level that may indicate a high level of investment. No points or mandatory fail criteria are associated with this benchmark for 2013. IHDA will also examine other factors when measuring its level of investment in a community (such as community size and percentage of rental units)
	If the PPA is due shortly after the final QAP is published, please allow project modifications beyond those currently allowed in the QAP so developers can adjust for the final QAP changes.	Virginia Pace and Larry Pusateri, The Lightengale Group	The Authority will be accommodating to changes made between the PPA and the full Application in response to changes in the QAP.
Application Process			
	The application must all include original signatures unless specifically listed otherwise on the application materials. It is difficult to obtain original signatures for IHDA of things such as the purchase agreement. We recommend that copies be acceptable for all items except for the Application Certification by the Owner to facilitate use of electronics and cutting down on the high cost of overnight and messenger services	Virginia Pace and Larry Pusateri, The Lightengale Group Jessica Berzac, Tangerine Development Group	The requirement has been removed to be replaced with an original signature Sponsor Certification and Acknowledgement form confirming the contents of the Application.
	4% applications shouldn't have to use IHDA-approved vendors for market studies, environmental reports and PNAs. Other financing sources in these deals require other lenders to choose the vendors. A 3rd party construction cost breakdown in the case of an ID of interest is also unnecessary. The investor and lender will police these costs.	Mark Laucbacher, Jason King	The Authority no long requires the use of approved vendors for market studies, environmental reports, and PNAs.
9% LIHTC Reservations, Carryover, and 10% Test			
	Please clarify the carryover provisions. Does a project awarded in the second round of 2012 have unit December 2013 to spend the 10%?	Ron Moline	Reservation letters are issued in the same year an award is made. A Carryover Allocation is required for all Projects that will not be Placed in Service during the year in which a Reservation Letter is issued. Projects issued a Carryover Allocation must expend more than ten percent (10%) of the Project's reasonably expected basis no later than December 1 of the year following the Carryover Allocation. Therefore, in your example, projects awarded credits in 2012 would need to complete a carryover allocation in 2012 and complete the 10% test by Dec 1, 2013.
Project Modifications and Revocations			
	This policy seems overreaching and ill defined. Does a change in financing terms include a change in interest rates that fluctuate weekly? An $800 increase in the cost of an appraisal could easily exceed the 10% per line item cost increase limit you have set. We are concerned that this language will provide much uncertainty to both developers and investors and does not provide for market fluctuations in pricing for construction, the equity markets and interest rates. The draft QAP is not clear when these modifications must be submitted to IHDA (and a $1,000 fee be paid) for these types of changes. Currently, IHDA reviews the overall financing at application, at the time of initial closing and again at 8609. As long as the request for IHDA's resources and developer's fees are not increased, it is unclear to us what problem you are trying to solve with these changes. We recommend IHDA include language to directly address only changes which fundamentally alter the project and which will result in a revocation of credits if not remedied. Please clarify and	Beth Demes, The Alden Foundation Virginia Pace and Larry Pusateri, The Lightengale Group Bruce Schiff and Andrea Traudt, IHC Thomas Monico, Thomas & Thomas Jessica Berzac, Tangerine Development Group Mark Laucbacher, Jason King	In order to effectively manage its programs and resources, Project changes and modifications must be reported and disclosed. Fees are assessed in cases of significant changes or when characteristics on which the original allocation was predicated are modified.
	The stated penalty of revocation of credits for "Failure to obtain an 8609 within six (6) months of a Project being Placed in Service" contradicts the policy in the following section that "Projects must submit all 8609 documentation to the Authority no later than six (6) months after the end of the year following the deadline to be Placed in Service." Is the 8609 due within six months of being placed in service or within six months of the end of the year in which it was placed in service? And is the threshold obtaining the 8609 or submitting it? And is a revocation of credits an appropriate penalty for this failure?	Mark Laucbacher, Jason King	The discrepancy has been addressed.
Mandatory			

G. Site Physical Information	Please clarify that if wetlands are shown within the boundary of a project and are not impacted, that the US Army Corp of Engineers (USACE) provides a Letter of No Objection (LONO), not a permit. The jurisdictional determination simply determines that the wetlands are part of the USACE jurisdiction. A permit is required when the wetlands are impacted.	Tom Suminski, Banner Apartments	The QAP has been clarified.
F. Zoning	Consider a caveat on Evidence of Zoning for NIMBY communities where zoning confirmations may be withheld, but the missing letter doesn't mean an inability to build under the current zoning.	Jessica Berzac, Tangerine Development Group	Confirmation of correct zoning by right or PUD is necessary to gauge a project's readiness to proceed. The Authority strives to uphold fair housing laws and to support projects facing discrimination wherever possible.
N. Market Analysis	Restore the less stringent requirement for market studies for PSH projects. The more comprehensive form is cost-prohibitive and not an accurate indicator of the value of PSH in the market.	Betsy Benito and Cindy Thomas, CSH	The comprehensive market study form was designed to in an effort to streamline all market studies - a necessity given that IHDA is no longer operating with an approved vendor list for Market Studies. Via this effort there are only a few new requirements being placed on PSH developments (Capture Rate, Penetration Rate, Absorption Rate, for example) that were not previously required. IHDA has found that Market Studies for PSH developments have historically included this information and would prefer to see some analysis on demand rather than none. IHDA does not anticipate these few additions making market analysis cost prohibitive, especially considering other required inclusions have been trimmed from the Market Study requirements.
	Is it possible to pass the PPA market review and not the mandatory market review in the full application?	Jessica Berzac, Tangerine Development Group	Yes. At the PPA level IHDA is considering the proposal's impact on existing IHDA properties. A market study analyzes many different aspects of a market and therefor may illuminate market issues that were not seen in the PPA assessment.
	Eliminate the market study requirement for rehab deals that will not increase rents. This is unnecessary for an already-occupied building not changing rents. A rent roll is more reliable.	Mark Laucbacher, Jason King	Much of IHDA decision whether to invest LIHTC in a rehabilitation project depends on the market. The occupancy status / rent roll of an existing property is indicative of the property's current status and does have a bearing on the market review of a development. However, IHDA's review also needs to take other aspects of the market into account and therefor must require a Market Study for all types of development.
	Will Secondary Market Areas be considered if the market analyst thinks it is relevant?	Valerie Kretchmer	SMAs are welcome inclusions in Market Analysis, but only PMAs are required and the scoring in the QAP will only be based on the PMA.
	These two sections are the same. Should every affordable property be shown, even if it's for a different population?	Valerie Kretchmer	The two sections are similar. IV, D to be removed. All properties should be provided (for all types of populations).
	Refers to exhibit 2 when it means Exhibit 3.	Valerie Kretchmer	This has been revised.
	It is not easy to find historical information on small employers in a small geographic area such as a PMA. Do you have suggestions of how we are to find this information if the local economic development department doesn't have it? Historical IDES employment data are available for Chicago zip codes and municipalities, but there isn't information on company size. We can use information from County Business Patterns by zip code, but the most currently available data are for 2010. Will this be recent enough to address this section of the market study?	Valerie Kretchmer	This is not a new inclusion and reflects no change from previous years. IHDA is looking for information on how the development fits within the local economy and whether its market is dependent on business of all sizes within that economy. IHDA is also trying to assess risk to a market posed if business of different types should locate or leave an area. We are not at this time recommending or endorsing data sources. It is up to the individual Market Analyst to utilize available data. 2010 data is acceptable as long as it is the most recent data made available.
	IHDA used to say 5-7% was acceptable for all types of properties. Now it is 5% for family and 7% for senior. What if there's no other housing of the project's type in the PMA? Is it acceptable then to have a higher capture rate?	Valerie Kretchmer	The proposed clarifies previously established paradigms. The 5%/7% rule existed before but was presented as a range in previous QAPs. Language to be added to the inclusion form allowing for an explanation for a high capture rate.
	Will you also look at the rate for only the LIHTC properties separate from all affordable properties? Will you consider the penetration rate for both the PMA and SMA if there is one?	Valerie Kretchmer	IHDA's formula for penetration rate includes the entire affordable market, not just LIHTC properties. All affordable properties, including LIHTC, are examined. The PMA alone will be scored, although we will review provided SMA information.
	Employment – The analysis of small businesses in the PMA and the change over past years will add to the cost of the study. The market study format requires the employment section for senior housing when it isn't really relevant.	Valerie Kretchmer	This provision is not a change from previous years. Senior housing deals will not be required to submit this analysis.
	Acquisition/rehab projects in the past didn't require the same detailed information on housing characteristics as the format for new construction.	Valerie Kretchmer	Not all acquisition rehab developments are in IHDA's portfolio and for non-IHDA deals, it is important that we examine the market characteristics and measure the need and viability of that market. It is also important to reexamine the market for deals in IHDA's portfolio that are older and for which the market/demand may have changed.
	Foreclosed, vacant and abandoned properties – this is a new section and it will take some time to get the small area data, especially for sites outside of the Chicago metro area.	Valerie Kretchmer	We are not requiring documentation from a specific source at this time. We have included this requirement in an effort to get a broader picture of the communities in which we are considering LIHTC investment.
O. Appropriate Development Team	Property management experience section requires several certifications, but it is unclear who provides these certifications. Which certifications will be accepted and by what date must the certification be provided and exactly what management company personnel must hold each certification?	Virginia Pace and Larry Pusateri, The Lightengale Group	On-site Property Management Certifications can be provided by the following: **Quadel** on-site manager certifications and Fair Housing; **Institute of Real Estate Management (IREM)** on-site manager certifications, Ethics for the RE Manager skills, and Fair Housing; **National Center for Housing Management (NCHM)** on-site manager certifications, Tax Credit Specialist, Certifications for Blended Occupancy-HUD/TC/HOME, and Fair Housing.
	Your requirements go beyond the law. Owners are allowed to lease apartments without licensure. Can Owners receive waivers to manage their own properties?	Ron Moline	While this requirement may exceed the legal requirements in some jurisdictions, the Authority believes that owners, residents, and the Authority are best served when leasing is conducted by licensed, trained professionals up-to-date on current legal and Fair Housing requirements.
	Must ALL managers have ALL certifications listed, or just one from the list? Will there be a grace period for experienced property managers to meet these requirements for site managers? Is the two years' experience required referring to the company as a whole or the specific site manager?	Beth Demes, The Alden Foundation	The agent should be able to demonstrate the appropriate certification(s) within the hierarchy for the property. Not all management staff need to have all required certifications. The two years' experience refers to the company as a whole.
	You require experience developing a project of equal or larger size to the proposed project. If a developer would like to create 60 units and their largest previous project was 40 units, they are unable to do so?	Ron Moline	The requirement has been revised to a project with at least 75% as many units as the one proposed.
	Developer Team qualifications should include an option for subcontractors or former staff of qualified companies to account for their transferrable skills and receive credit for experience.	Bruce Schiff and Andrea Traudt, IHC	Experience certifications review the project principals' experience. If like experience and responsibility was obtained under a different/previous entity, the Authority considers that experience. Experience as a sub-contractor/consultant does not meet minimum experience requirements.
P. Financial Feasibility	The change from underwriting rents at 95% of the limit down to 90% is too restrictive. It is important to arrive at an appropriate balance between cushions and leverage. We suggest that IHDA restore the underwriting standard to 95%. Or a sliding scale where for 30% of AMI units, that IHDA allow 100% of the maximum rents and restrict the assumptions for higher AMI units.	Mark Laucbacher, Jason King Thomas Monico, Thomas & Thomas Mike Smith, Pedcor	The underwriting threshold has been revised to 95% of the rent limit.
	Showing maximum rents at 90% will make rural deals more difficult to underwrite based on IHDA standards of long term cash flow, property tax trending, and cash flow requirements.	Virginia Pace and Larry Pusateri, The Lightengale Group	The underwriting threshold has been revised to 95% of the rent limit.

	Please allow underwriting of units at 30% AMI to remain at 95% of the rent limit, if 60% units must be reduced to 90%. Demand is very high for 30% units.	Bruce Schiff and Andrea Traudt, IHC George Dinges on behalf of 15 downstate IHC members	The underwriting threshold has been revised to 95% of the rent limit.
	We suggest IHDA adjust the requirement to trend property taxes at 5% inflation. This is an old artifact from QAPs of more than a decade ago that is not supported by evidence. 5% trending is quite odd in a state with "property tax caps" laws in most counties. 5% trending is resulting in IHDA injecting more soft dollars to close deals. A 3% trending for property taxes is adequate.	Mark Laucbacher, Jason King	The real estate taxes trending factor has been revised to 4%.
	Consider allowing tenant coordination services in the eligible operating expenses. Funding for basic services that are disability neutral is hard to come by, but must be in place to open new supportive housing developments. Syndicators look for basic tenant services to promote project stability. Underwriting these services at $3,000 per unit will help more projects meet the State's goals.	Betsy Benito and Cindy Thomas, CSH	With flat rents and increasing expenses, operating revenues must support property operations and leverage scarce capital resources by maximizing debt. IHDA does not have resources to subsidize these non-housing operating costs.
	Developers should be allowed to use comparable properties as a basis for utility costs. Using Housing Authority numbers are usually $20 higher since non-energy efficient buildings raise their average costs.	Ron Moline	The QAP permits a utility allowance schedule from the governing public housing authority or a one year utility survey representative of each unit type in the project.
	Real estate taxes should be budgeted at a flat rate outside of Chicago. It is difficult to educate tax assessors about Section 42.	Ron Moline	Real estate taxes vary significantly by project type and location.
	Developer Fee – to encourage the provision of more supportive housing/ targeted units, we recommend increasing the fee percentage to 13% overall for projects that include a 10% Targeted Units component.	Virginia Pace and Larry Pusateri, The Lightengale Group	Projects targeting Supportive Housing Populations may have lower amounts of cash flow after debt service and as a result will be required to defer less fee resulting in a larger amount of realized developer fee than non Supportive Housing Population Projects.
	Developer fee shouldn't be limited on 4% projects with no IHDA financing. Some larger 4% projects rely on the basis created from higher developer fees to raise the necessary equity. The City of Chicago lifts the fee limit for 4% deals. The limit of 50% of construction contingency included in basis should also be lifted for 4% deals.	Mark Laucbacher, Jason King	Low income housing tax credits are a public resource and all tax credit projects are held to the same underwriting requirements.
	The general contractor is allowed 14% for general conditions, overhead and profit. What was wrong with 12%?	Ron Moline	The general contractor fee limits have not increased from the 2012 QAP. The total of general conditions, overhead and profit has been limited to 14% for a number of years.
	Please include required DCR in the QAP, not just as a reference to the Common App. It is important the QAP is clear on these expectations. Does the statement, "Project reserves may not be used to maintain debt service coverage ratios" mean one cannot capitalize a sinking fund specifically to meet DCR requirements in outer years?	Beth Demes, the Alden Foundation Bruce Schiff and Andrea Traudt, IHC	DCR requirements have been stated in the QAP. A Project's financial feasibility in the initial 15 year operating period cannot be dependent on capitalized resource payouts.
	Authority loan limits - Without the boost and with the floating 9% rate, many developments will need soft funds above the Authority loan limits. Please consider allowing projects to apply for soft funds exceeding the limits while you determine which projects will receive a boost. Fees for these soft fund applications should be due at the time of award, rather than application.	Bruce Schiff and Andrea Traudt, IHC Joshua Wilmoth, Full Circle Communities	Prior to HERA the discretionary Boost was not available to any Project. In an effort to manage resources and control for costs, the automatic Boost has been eliminated.
	Does the required term for both below market Authority debt and non-Authority debt mean *at least* 15 yrs? In FHA transactions the debt must be coterminous with the FHA loan period, usually 40 years.	Virginia Pace and Larry Pusateri, The Lightengale Group	The language in the QAP has been clarified.
	Please define, in the QAP, what lines are included in the hard cost limit calculation. Simply referring to the calculation in the Common Application is not clear.	Beth Demes, the Alden Foundation Bruce Schiff and Andrea Traudt, IHC	The lines in the Common Application development budget that make up the Project's Grand Total Hard Costs are what is included in the hard cost limit calculation.
	The grand total hard cost limit should be applied firmly and without exception. Each time the Authority approves projects over the limit, fewer credits are available for remaining applicants.	Thomas Monico, Thomas & Thomas	Projects do not receive tax credits based on hard costs that exceed the stated limits. Eligible basis is restricted to the hard cost limits.
	Please revise the methodology for the hard cost limits to include a geographic component of the calculation. While we understand that this is not a threshold item and could be addressed on a case-by-case basis as described in the QAP, that should be the exception not the rule. Revising these limits to factor in the geographic differences in costs between Chicago, Metro, Other Metro, and Non-Metro development (as the QAP does for many other cost and expense limits within the QAP) seem appropriate. Likewise, development size, elderly versus non-elderly restrictions, and other factors could also be appropriate for this calculation.	Tom Suminski, Banner Apartments	The hard cost limits are based on the HUD published high cost percentage multiplier for the City of Chicago. The Authority may provide lower limits tied to the lower high cost multipliers in other areas of the state to control project costs.
	Vacancy rates are required at 10% for supportive housing projects. Does this mean Targeted Units? There is no definition for Supportive Housing Projects.	Virginia Pace and Larry Pusateri, The Lightengale Group	The definition has been clarified to projects with a preference for Supportive Housing Populations in 50% or more of the units.
	Replacement Reserves should say greater than or equal to 2BR and 3BR in the Project Type box	Virginia Pace and Larry Pusateri, The Lightengale Group	The QAP has been clarified.
Scoring			
Development Amenities	Recommend eliminating the Developer Amenities points. This is not defined so will be difficult to assess what will be allowed. IHDA previously had an Innovative category and we understood these items were eventually removed because of the difficulty of administering the item fairly.	Virginia Pace and Larry Pusateri, The Lightengale Group	The points have been eliminated.
	We support points given to projects with secured bicycle parking, nearby trails, on-site garden plots, native landscaping and sustainable building practices. All of these help to implement recommendations contained in GO TO 2040, the region's comprehensive plan.	Robert Dean, CMAP David Bennett, Metropolitan Mayors Caucus	Thank you for your comment.
	It will be difficult for developers to design an extra four amenities in addition to ten from the list for maximum points. Will the Authority provide examples of these amenities?	Thomas Monico, Thomas & Thomas	The points have been eliminated
Green Initiatives	Recommend reinstating the NAHB National Green Building Standards as a criterion that scores 3 or 4 points.	Mark Laucbacher, Jason King	The option has been reinstated.
	Please add ICC 700 National Green Building Standard certification to the threshold for scoring points in this category. The goal of the NGBS certification program is to recognize projects that reach exceptional levels of sustainable design. Certification fees are low and time needed for project review is minimized. NAHB Research Center's certification to the NGBS are as rigorous, if not more, than the rating systems currently recognized in the QAP. NGBS was specifically designed for residential projects and is affordable to implement. It is the only ANSI-approved residential green building rating system in the country and it is a true consensus based standard developed by a balance of stakeholders.	Michael Luzier, NAHB Research Center	The option has been reinstated.
	This removed the separate standard for rehabilitation, which often are not gut rehabilitations, so have a more difficult time achieving certification. This is a major competitive disadvantage to rehabs which seem to be encouraged elsewhere in the QAP draft. Energy Star appears to only be available for new construction or gut rehabilitation projects, not moderate rehabilitation, so these points would be limited to these types of projects.	Virginia Pace and Larry Pusateri, The Lightengale Group	Rehabilitation projects receive points under the rehabilitation and adaptive reuse category. These points are not available to new construction. You could say that is a competitive disadvantage to new construction projects. The Green Initiatives category emphasizes major energy efficiency gains of over 15%. If the rehabilitation project cannot achieve these savings scoring points should not be awarded.

	Any 4 or 5 story new-construction project with a central HVAC system would not be able to obtain Energy Star certification. We recommend that IHDA instead require the use of Energy Star appliances and, if there are individual furnaces/ hot water heaters, include those items as well to be eligible for these points.	Virginia Pace and Larry Pusateri, The Lightengale Group	This type of project can receive Energy Start Certification under the Energy Star Multifamily High Rise program.
	We commend IHDA for maintaining your commitment to green building and fully support the inclusion of a monitoring component into the QAP scoring. In our updated analysis of 52 affordable housing developments, the average project analyzed achieved a lifetime utility cost savings of $3,709 per dwelling unit, while the incremental cost per unit to comply with the Enterprise Green Communities Criteria was $3,546. Lifetime savings exceeded the cost of integrating the Criteria into affordable housing.	Andrew Geer, Enterprise	Thank you for your comment.
	LEED and Enterprise add substantial construction costs. Offer points for incorporation of certain energy efficient systems aside from these two programs	Arby Smith, RichSmith Development	Energy Star and Indoor Air Quality Plus certification are also scoring categories. These certification emphasis the energy and water savings that will benefit the project over time with lower operating costs. Their payback period is very short and they are easily achievable. With the State of Illinois adoption of the 2012 International Energy Conservation Code in January 2013, the cost of achieving Energy Star certification above mandatory code will be minimal. ICC 700 National Green Building Standard (NGBS) certification: Including compliance with Section 704.6.2, third part testing, has been added as a certification option.
	Is this 3 or 4 points? Scoring matrix and text don't match.	Joshua Wilmoth, Full Circle Communities Jessica Berzac, Tangerine Development Group Mark Laucbacher, Jason King	The QAP has been clarified.
Unit Mix	Text and numerals for elderly units don't match. Is it 20% or 25%?	Joshua Wilmoth, Full Circle Communities Thomas Monico Virginia Pace and Larry Pusateri, The Lightengale Group Ron Moline	The QAP has been clarified.
Larger Units	For Elderly units, you obtain 3 points for 15-20% of 2 BR units. This conflicts with the Unit Mix points where you get 2 points for having at least 20% 2 BR units. If you have a 51 unit project and set aside 11 units as 2 BRs to meet IHDA's unit mix preference, you then have 21.5% 2 BR units, so cannot achieve the larger unit points since the percentage exceeds 20%. It would be helpful to allow for rounding to meet both IHDA priorities of a 20% 2 BR units in an elderly project. Thus, either the Unit Mix 2 point Elderly item could provide for at least 16% of two unit types and keep the large units for up to 20% or keep the Unit Mix the same and change the Large Unit category to allow up to 24% two-bedroom units to allow for this rounding (which would accommodate a 21 unit senior project)	Virginia Pace and Larry Pusateri, The Lightengale Group	The thresholds have been revised to appropriately intersect.
	Non-Elderly Units; for Supportive Housing projects should that category be reinstated, we recommend that Larger Unit points be available for the provision of two-bedroom units in the same ratio so as to avoid a competitive disadvantage to Supportive Housing projects primarily serving singles.	Virginia Pace and Larry Pusateri, The Lightengale Group	The two scoring categories for this section are Elderly Restricted and Non-Elderly.
Rehab or Adaptive Reuse	Is Hard Residential Construction Costs simply the number at the bottom of the construction cost breakdown exhibit? It would be helpful to have clarification of the % rehabilitation threshold. If there are zero new construction units, would the project score at the 75% or more level?	Mark Laucbacher, Jason King	A scoring form with clarification on the calculation will be posted.
	If the intent of this category is to preserve/re-use vacant properties, it would make sense to measure the scoring differently. If a number of vacant properties are acquired from banks and bundled into a LIHTC proposal, many of these properties may require demolition and replacement by new construction. In this case, the project still meets the goal of revitalizing vacant properties, but does not have costs attributable to rehab. Please consider incorporating these points for projects making use of foreclosed sites, even when the proposal includes demolition.	Tara Peele, IFF	This category seeks to encourage the reuse of existing assets and is not focused on revitalization through new construction.
Market Characteristics	This scoring category seems very subjective. What import do the three determinations have on scoring? There are no definitions as to the market characteristics? What determines inferior vs. superior?	Thomas Monico, Thomas & Thomas	Specific category definitions and methodology for IHDA's determination of an inferior vs. superior market are provided as part of IHDA's Standards for Site and Market Study Reviews and Professionals, which is available on IHDA's website .
	I am concerned that this scoring is very rigid and doesn't allow for judgments on the part of the reviewer or for the market analyst to explain why the site and project are good despite "Not Meeting Expectations" in some of the categories.	Valerie Kretchmer	Based on past experience, a more ridged scoring system is required, especially as there is no longer an "approved vendor list" for Site and Market Analysts. To insure more universal quality, clearer rules and processes have been implemented. There are certainly some elements that warrant an opportunity for further explanation and that will be available in a few categories (Marketability/ Visibility, Population Projections, Job Growth are potential candidates for this).
	Targeted Population – Confusing. Is it the same as the penetration rate in Category 3?	Valerie Kretchmer	Targeted population is not the same as penetration rate. Targeted population aims to determine the prevalence of population types that are served by the affordable units within a PMA. This helps make clearer the need for particular types of housing.
	Unit Sizes – If the units meet IHDA's minimum sizes, do you consider this to "Meet Expectations" even if the units may be smaller than some competitive properties but larger than others? This could result in selectively excluding potentially competitive market rate properties if their units are bigger than the proposed project.	Valerie Kretchmer	IHDA does not consider market scoring criteria in relationship to the Architecture and Construction Standard's minimum unit sizes. The market scoring criteria compares project unit sizes to other like properties in the PMA. It is intended to demonstrate the property's ability to compete with or potentially negatively impact other affordable properties.
	Rent Structure – Is this in comparison to other LIHTC properties, all affordable properties or market rate properties?	Valerie Kretchmer	The Rent Structure scoring criteria scores the rent structure of the property in relation to the other comparable properties in the PMA. Comparables are identified and justified the Market Analyst.
	Marketability/Visibility -- Visibility is different than marketability, though it is one factor relative to marketability. "Exceeds Expectations" looks like it's only based on visibility not marketability. Will you consider other aspects of marketability here?	Valerie Kretchmer	This criteria refers to objective methods of determining the marketability of a site. Visibility is one of the more obvious methods of demonstrating marketability. We allow for additional comments demonstrating marketability, but these factors are only considered if they are clearly demonstrated by the market study.

	Household and Population Projections -- Just because an area is projected to show a decline doesn't mean there isn't a strong need for LIHTC housing or that a project would not be successful. This seems to penalize properties in suburban Cook County vs. the collar counties, some neighborhoods of Chicago and many rural areas. Other sections in the QAP favor sites in older city and suburban neighborhoods that have shopping and amenities within ½ mile. Areas with growing population may be on the fringe of metro areas and not in areas that have nearby shopping. In addition, population and household projections could be different when they come from different sources. It might be fairer to look at population and household change from 2000-2010 from the Census when scoring these two criteria.	Valerie Kretchmer	Some PMAs are more suitable than others and a declining population / household projection is one indicator of this fact. Category 3 scores many more factors that speak to the PMA's attributes, so projects in areas of declining population are not unfairly penalized. The Market Analyst will have an opportunity to explain declining demographics.
	Job Growth -- There are examples where jobs will be lost but there is still a great need for affordable housing. Libertyville is one example. Google is relocating 1,000 former Motorola jobs downtown. However, Libertyville is still an area that doesn't have much affordable housing.	Valerie Kretchmer	Job growth is an important indicator of a PMA's appropriateness and a proxy measurement for rectifying the jobs/housing mismatch. Category 3 scores factors that speak to many of the PMA's attributes, so projects are not unfairly penalized because of net job loss. Market Analyst may explain the affects of job loss in the market study.
	Job Growth -- Also, will job growth be used to evaluate senior sites as well as family ones? This isn't relevant to the demand for senior housing.	Valerie Kretchmer	Elderly-restricted projects will not be required to submit this analysis.
	What is the definition of" employment center" in the PMA? Under "Meets Expectations" and "Does Not Meet Expectations", it says PMA. Under "Exceeds Expectations" it says employment centers in town, not specifically the PMA. Which do you mean? What about job locations within easy commuting distance of a site even if the jobs aren't within the PMA or town? Many neighborhoods in Chicago don't have "employment centers" but have good access via public transit to jobs downtown and other areas.	Valerie Kretchmer	The definition will be clarified and the word "town" was incorrect. It has been changed to "PMA."
Neighborhood Assets	We like the idea behind the change of the radius for neighborhood assets to a tighter 0.5 mile radius and feel this is appropriate for Chicago. Proximity matters and closer is better. However, any single distance will be arbitrary. The limit is unreasonable for rural areas. Consider expanding distance limit to 1 mile for suburban and rural projects (or communities under 20,000), at minimum.	Mark Laucbacher, Jason King Virginia Pace and Larry Pusateri, The Lightengale Group Beth Demes, The Alden Foundation Dalitso Sulamoyo, ICADC Arby Smith, RichSmith Development Thomas Monico, Thomas & Thomas Jessica Berzac, Tangerine Development Group George Dinges on behalf of 15 downstate IHC members	This category aims to promote quality housing opportunities as well as environmental sustainability by selecting sites that are closer to amenities (including transportation) and well connected to previously developed sites. The radius has been redefined by set-aside to acknowledge the limited walkability of rural areas.
	Please clarify the applicability of this section to an elderly development. In the definition of "Elderly Services" the QAP lists many items that would appear to compliment this section, however the only category in the section that makes a distinction between Elderly and non-Elderly developments is with respect to schools and senior centers. It appears that this distinction should either be applied consistently to other categories, like recreation and social services, or omitted and the thresholds revised to be more inclusive.	Tom Suminski, Banner Apartments	The provision of Elderly Services has been added to the Neighborhood Assets scoring section. All Projects can benefit from multiple neighborhood assets even if they are not elderly-specific for an elderly Project.
	We support points given to projects with access to nearby transit, grocery stores, schools, senior centers and parks. All of these help to implement recommendations contained in GO TO 2040, the region's comprehensive plan.	Robert Dean, CMAP	Thank you for your comment.
	We request clarification and higher prioritization around Transit Oriented Development. The Center for Housing Policy (2006) reports that on average low-income families spend nearly 70% of household income on combined housing and transportation. For low-income families located near transit centers, the cost of housing plus transportation decreases by over 20%. We believe IHDA should award a minimum of 3 points to projects located within 0.5 miles of fixed route transit. We firmly believe this amenity provides deeper benefits than the other proposed amenities.	Andrew Geer, Enterprise	The category has been revised to 2 (two) points.
	Please eliminate the term "intra-city" from your definition of TOD. It implies suburban communities with Metra and PACE service are not eligible.	Andrew Geer, Enterprise MarySue Barrett, MPC	The definition has been revised.
	Can a project receive multiple points for similar assets (like a library and post office within .5 miles)? For Health Services, confirm projects must be located within .5 miles of both a pharmacy and one of the other services.	Joshua Wilmoth, Full Circle Communities	Points in this category are limited to one point per asset class (i.e. one library, plus one elementary school, plus one bus stop, plus one dial-a-ride service, plus one pharmacy and hospital). Yes, the Health Services points require the project to be located within the proximity radius of a pharmacy *and* a health clinic/hospital.
	Points should be awarded for any public school within 0.5 miles, including elementary, middle school or high school.	Joshua Wilmoth, Full Circle Communities Jim Lutz, RHCDA, George Dinges on behalf of 15 downstate IHC members	The intention of this category is to include schools the serve any combination of grades between Kindergarten and 12th grade, not *all* grades K-12. Language has been updated to clarify this meaning.
	Consider an alternate Public amenity for PSH developments that don't benefit from a public school or senior center	Jessica Berzac, Tangerine Development Group	All housing can benefit from a public school and/or senior center, regardless of the potential need for supportive services for the household head.
	What are the specific requirements for Dial-A-Ride? Must it be provided by the municipality?	Virginia Pace and Larry Pusateri, The Lightengale Group	The requirement has been clarified in the QAP.
	Does a pharmacy with walk-in clinic meet both requirements for Health Services?	Virginia Pace and Larry Pusateri, The Lightengale Group	Yes, a single location with both services meets the requirements for this category.
	Are all distances as the crow flies?	Virginia Pace and Larry Pusateri, The Lightengale Group	All distances are a straight line radius of the Project site.
	Can a Walmart with many uses (grocery store, pharmacy, health clinic) count in multiple categories?	Virginia Pace and Larry Pusateri, The Lightengale Group	Yes, a single location with services in multiple categories meets the requirements.
Jobs	Are the minimum number of jobs of ALL jobs or just jobs of a certain wage level as in last year's QAP? Please clarify the methodology.	Virginia Pace and Larry Pusateri, The Lightengale Group Tom Suminski, Banner Apartments	Clarification of the methodology will be posted with scoring documents as they are available.
	We appreciate efforts to incorporate this difficult measure. The certification mentioned in the QAP is not available on the website. The 3,000 jobs within 2 miles criteria seems like a high threshold for many rural communities.	Mark Laucbacher, Jason King Ron Moline	Clarification of the methodology will be posted with scoring documents as they are available. Some rural communities may not have an adequate number of jobs to score points.

	The minimum jobs threshold for Chicago should be 50,000. The values in the other set-asides set a high bar, but the Chicago value does not.	Tom Suminski, Banner Apartments	The threshold has been revised.
	Please clarify the applicability of this section to Elderly developments. Because residents of Elderly developments often remain employed or seeking employment long after the ages required to live in these properties, including both 55 and over and 62 and over, we recommend allowing the jobs section to apply to all developments.	Tom Suminski, Banner Apartments	The jobs section applies to all projects, regardless of the intended tenant population.
	Does this also apply for senior buildings? It would not appear to be relevant for seniors.	Valerie Kretchmer	Communities near jobs are stable communities that benefit all residents, including children and the elderly, not just the workforce.
Revitalization Plan	Prioritize projects that implement strategies endorsed by an interjurisdictional plan or study.	Robert Dean, CMAP	Interjurisdictional plans have been added to the list.
	We welcome the increased list of acceptable plans. We request local enterprise zone plans be added to the list rather than having to seek IHDA approval for "other locally designated plans." These are important local-State development partnerships downstate.	George Dinges on behalf of 15 downstate IHC members	Enterprise zone plans have been added to the list.
	Please include in examples of eligible plans: 1. Land Bank Authority Communities and 2. Communities with TOD plans sponsored by transit agencies. Inclusion of these plans will help incent and align resources and promote region collaborative planning and the inclusion of affordable housing in those plans.	Andrew Geer, Enterprise MarySue Barrett, MPC	Land bank authority and transit oriented development plans have been added to the list.
MAFBE	If IHDA wishes to encourage significant M/WBE experience in a transaction, we recommend adding back points for sponsors and consultants participants, but not allow both to earn a point so as to keep projects with and without consultants on even footing.	Virginia Pace and Larry Pusateri, The Lightengale Group Jessica Berzac, Tangerine Development Group	A scoring option for Sponsors has been added.
	Is 1 point available for material participation without any ownership interest?	Virginia Pace and Larry Pusateri, The Lightengale Group	Correct.
	Using these qualified firms adds significant cost and using three of them would be cost prohibitive. If the minority population in our country is now greater than the Caucasian population, who is the minority now?	Thomas Monico, Thomas & Thomas	Thank you for your comment.
Non-profit	Increase scoring for material partnerships with nonprofits because they offer a range of expertise that a traditional developer does not. Offer two points for ownership interest between 15% and 99%. Consider returning the score to it's level of importance in 2012: 6% of total points available.	Betsey Benito and Cindy Thomas, Corporation for Supportive Housing Dalitso Sulamoyo, ICADC George Dinges on behalf of 15 downstate IHC members	Material Participation, as defined by the IRS, may be a low threshold of participation. Two (2) points have been added for non-profit ownership of at least 25%.
Illinois Based Participation	It is not appropriate to award preference to Illinois based businesses under a Federal program like LIHTC. This unfairly penalizes experienced architects working on affordable housing nationwide and is not applied to engineers, banks, interior designers or other consultants participating in the projects.	David Layman and Frank Bednarek, Hooker De Jong	Thank you for your comment.
	Sponsor has been removed as an eligible entity. Why are there points available for entities that have a shorter-term involvement, like an architect?	Jessica Berzac, Tangerine Development Group	A scoring option for Sponsors has been added.
Rental Assistance	Family projects not already HUD-subsidized are not eligible to receive more than 25% of the total units as project-based assistance; thus, this scoring seems to favor senior projects and preservation projects with existing contracts.	Virginia Pace and Larry Pusateri, The Lightengale Group	This category views projects for all population types equally and allows rental assistance from many sources other than HUD.
	Does LTOS qualify as "Other State or Federal sources as determined by the Authority"? Or is it considered under the State Administered Operating Subsidy category, or both?	Beth Demes, The Alden Foundation	LTOS is administered under the Rental Housing Support Program, which is listed as a qualified example under the "State and Federal" rental assistance category. However, because this scoring category requires rental assistance commitments be in place at the time of application, a LIHTC application that includes a request for IHDA-administered LTOS as well would not score points.
	Does an 18-61 year old disabled SLF qualify as being rent assisted if the SLF has received IDHFS's award letter? That is a perpetual program with no defined end date. It doesn't include a 30% income limit on rents, but achieves the objective of this section.	Virginia Pace and Larry Pusateri, The Lightengale Group	An SLF is not considered to provide rental assistance for scoring in this category.
	This category contains too many points in the entire system. Why do we continue to reward Section 8 projects for double dipping into Federal funds? These transactions often work well as 4% deals, so we shouldn't encourage them to compete for scarce 9% credits. This favoritism is also driving up the acquisition price for these properties to above market value.	Thomas Monico, Thomas & Thomas	The Authority strives to balance the incentives for Projects across all populations and areas of the state.
Preservation of Rental Assistance	Rural Development will not sign a rental assistance contract for longer than one year. The contracts are renewed annually based on Congressional appropriation. If IHDA's intent is to preserve Section 515 projects and RD rental assistance, these scoring criteria don't like up with RD policy.	Joshua Hafron, General Capital Group	A rental assistance contract subject to annual appropriations with a longer assumed term will be accepted with an explanation from the rental assistance program administrator.
	Does IHDA view this category as mutually exclusive from Rental Assistance or can points be scored in both categories? Please include a more detailed description of "extension." It is difficult to get an extension commitment from HUD.	Mark Laucbacher, Jason King	Projects can earn points in both categories. A commitment to extend rental assistance, subject to financing approval, is acceptable.
	Is this the same as the previous category, except for projects that are currently assisted? What are the requirements for the existing assistance? Does this apply to LIHTC deals with compliance remaining? What length does the assistance refer to?	Virginia Pace and Larry Pusateri, The Lightengale Group	This category applies to the extension of an existing commitment. "Length of Assistance" has been revised to "Length of Extension"
Leveraging Resources	It seems quite uncommon that more than 60% of the project costs would be funded by non-Authority resources. We suggest recalibrating the maximum points to 60% leveraging of non-Authority resource (rather than 80%) with corresponding changes down the scale.	Mark Laucbacher, Jason King	The scale has been adjusted.
	Prioritize projects that leverage grant funding from other federal sources for predevelopment and land acquisition - specifically HUD Challenge grants.	Robert Dean, CMAP David Bennett, Metropolitan Mayors Caucus	Up to five points are awarded in the Leveraging scoring category for funds provided by a non-Authority source.
30% AMI Housing	Consider awarding points for 15% or more units at 30% AMI WITHOUT the requirement that all of the units have project-based vouchers. A 20% set-aside at 30% AMI may be financially feasible for some projects without vouchers. The outcome of the policy as it stands will reduce the number of 30% AMI units that developers will include in their projects, as many cannot obtain vouchers.	Beth Demes, The Alden Foundation Thomas Monico, Thomas & Thomas	The rental assistance requirement has been removed.
	LTOS and the proposed 811 plans favor using those resources on Extremely Low Income units, but if ELI/Targeted units must have subsidy already in place, in precludes LIHTC applicants from using these programs for ELI units and those funds will end up on high AMI units. We recommend changing the rental subsidy requirement for 30% units to have existing assistance in place OR to accept state-administered subsidy, subject to the 25% maximum limit on LTOS or 811.	Joshua Wilmoth, Full Circle Communities	The rental assistance requirement has been removed.

Permanent Supportive Housing	This QAP eliminates the concept and scoring preference for special needs / supportive housing except for the Targeted Units. In addition, because the Targeted Units can only be made available through IHDA's process (wherein the IHDA waitlist is used, instead of a public housing authority waitlist for special needs or a project-based waitlist, also allowed for HAP recipients), this appears to eliminate the opportunity for project-based subsidy for the supportive housing population, other than a DMH Bridge subsidy. Overall, this will make it more difficult for service providers to provide housing for their populations since IHDA eliminated the scoring and preference for supportive housing which can qualify for project based voucher assistance.	Virginia Pace and Larry Pusateri, The Lightengale Group	The Authority believes that State Referral Network units are compatible with Public Housing Authority project-based subsidy and has examples of Referral Network Units with PHA project-based subsidy. See below for answer on scoring preferences for supportive housing.
	The QAP should mandate integration of targeted units in all projects, as 19 other states require.	Betsy Benito and Cindy Thomas, CSH	The Authority has established a significant point incentive for integrated supportive housing units and does not think a mandate is necessary at this time.
	Restore 2012 scoring structure that strongly incentivized PSH. Increase scoring for inclusion of targeted and non-targeted PSH. With no incentive for non-targeted PSH, production will be negatively impacted. 50 of 54 HFAs have this incentive. Projects that include more than 20% PSH should not be penalized. All projects serving tenants with special needs should receive points. If you restore these points, IHDA would see up to 75% more PSH units every year.	Betsy Benito and Cindy Thomas, CSH Eric Huffman, Over the Rainbow Jessica Berzac, Tangerine Development Group	The Authority is confident that supportive housing developments that include targeted units within a larger supportive housing development can continue to score very competitively. The "extremely low-income unit" point category and the "rental assistance" category incentivize the development of units that can serve supportive housing populations. The Authority has also incentivized the development of PSH through is Permanent Supportive Housing Development Program.
	We fully support the continuance of the established priorities for supportive housing. We strongly encourage IHDA to continue working with Dan Burke in Governor Quinn's office to address barriers to occupying targeted units with special needs populations and ensure the provision of services are available from quality service providers in the community.	Andrew Geer, Enterprise	Thank you for your comment.
	Neither the QAP nor the PSH certification make mention of proposed PSH units in ac/rehab properties having to be vacant through the application process. It seems counter productive to create limitations on existing properties that would like to incorporate PSH units.	Mark Laucbacher, Jason King	The requirement has been clarified. The objective is to create housing for Supportive Housing populations and if units are currently occupied or subject to an existing waiting list, may not become available as intended.
	Are elderly only projects eligible to participate in the targeting program?	Virginia Pace and Larry Pusateri, The Lightengale Group	Yes.
	It would be helpful to reiterate in this section (not just the definitions), that Targeted Units must be at 30% AMI and that required project-based rental assistance must be compatible with State referrals, unless this is no longer a requirement.	Tara Peele, IFF	A note of clarification has been added.
State-Administered Rental Assistance	Clarify if points are available for projects that DO have a subsidy that certify willingness to accept State subsidies, such as BRIDGE contracts.	Jessica Berzac, Tangerine Development Group	In order to receive points in this category, the Project must contain units that do not have rental subsidy commitments.
Veterans Housing	We recommend a minimum threshold percentage of VASH subsidized units to receive points in this category and a graduated point system, perhaps one point for 20% of units reserved for veterans (or VASH) up to four points for 80%.	Joshua Wilmoth, Full Circle Communities	The scoring criteria has been revised.
	We recommend awarding points for five categories of service to veterans: 1. projects prioritizing units for veterans (as allowed through HERA), with a minimum threshold of 50% of units set-aside for veterans and additional points for 100% veterans. 2. projects with written VA commitments for social services funding and/or VA staff allocation, specifically for on-site social service provision. 3. projects with project-based VASH with a minimum of 50% VASH and additional points for 100%. 4. projects located within one mile of a VA Hospital or Clinic, with fewer points awarded for projects further away that have a bus or train connection to a VA hospital or the commitment of private van service. 5. owners with experience administering social service programs for veterans. The experienced owner entity should control a minimum of 50% of the general partnership.	Mitchell Milner	The scoring criteria has been revised.
	It is our understanding that VASH vouchers and Per-Diem can only be awarded to an operating projects and that Per-Diem is only available to Transitional Housing projects. Could an award of PBV with a statement from the Housing Authority that the PBVs would be converted to VASH upon project completion meet this requirement?	Virginia Pace and Larry Pusateri, The Lightengale Group	The scoring criteria has been revised and clarified.