
HDGF Comments

From Brittany Keller <brittany@yshome.org>

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To QAP, OHFA <QAP@ohiohome.org>

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Hi,

I would like to submit the following comments to the latest draft of HDGF guidelines:

Threshold Requirements

- Suggest extra scoring for deeper affordability

Funding Limits

- **Rural/non-PJs should be able to apply for an exception or be automatically granted an exception to apply for more than 50% of project costs** (non-PJs should be able to apply for 65% of total development costs, which is generally in line with the HUD per-unit subsidy limits)
- Recommend an exception request option for subsidy per unit limits for rural/non-PJs
- Recommend additional scoring points for longer-term affordability commitment through deed restrictions and/or community land trust ownership (more than 30 years) - could also be a tiebreaker
- The exception request form should include exception requests for both 10% withholding prior to the issuance of the final performance report and non-PJs' ability to request more than 50% of project costs, and HUD per-unit cost limits

Fees

- The application fees seem high for smaller HDGF projects in rural areas and smaller nonprofit developers
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Competitive Scoring

- There are scoring factors outside of an applicant's control, including the Housing Index and neighborhood scoring systems, which will reduce the competitiveness of certain geographic areas in the state

- We are concerned about the set-aside for Permanent Supportive Housing and its impact on non-PSH project funding availability
- **Given the unique HDGF program, which is designed to primarily support rural areas, non-PJs, and smaller projects, we recommend eliminating the HDGF/unit competitive scoring criteria altogether,** as it is more suited to larger LIHTC projects. The primary reason why HDGF exists is to support non-PJs, which lack access to the kind of funding that exists in PJs and larger cities.

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Brittany Parsons Keller

(she/her)

Development Coordinator

Yellow Springs Home, Inc.

(937)767-2790 ext. 1#

brittany@yshome.org