

**From:** Card, Rachel  
**To:** Pitts, TedTedPitts@gov.sc.gov  
Veldran, KatherineKatherineVeldran@gov.sc.gov  
**Date:** 12/10/2013 6:00:37 PM  
**Subject:** Fw: SC Housing QAP

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**From:** Chris Rogers [mailto:crogers@rogerslewis.com]  
**Sent:** Tuesday, December 10, 2013 05:57 PM  
**To:** Card, Rachel  
**Subject:** RE: SC Housing QAP

Yes. These are very similar and are causing problems in those states as well. But I think the difference is that they did not add the provisions without any opportunity for public comment in those states, as SC Housing did here.

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**From:** Card, Rachel [mailto:RachelCard@gov.sc.gov]  
**Sent:** Tuesday, December 10, 2013 5:27 PM  
**To:** Chris Rogers  
**Subject:** RE: SC Housing QAP

Hey Chris,

One quick question regarding other states that you may know the answer to – “Does the proposed QAP for SC have similar provisions to those NC and AL, when it comes to your concerns?”

Thanks.  
Rachel

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**From:** Chris Rogers [mailto:crogers@rogerslewis.com]  
**Sent:** Monday, December 09, 2013 1:06 PM  
**To:** Card, Rachel  
**Subject:** SC Housing QAP  
**Importance:** High

Rachel,

Per our phone discussion, I would like to bring an urgent issue to the governor’s attention. The SC State Housing Finance and Development Authority recently submitted a Qualified Allocation Plan for the Governor’s approval. This plan provides the process and scoring system by which competing developers will be selected to build low income housing in South Carolina using federal and state funding.

SC Housing normally holds public hearings for concerned individuals to express opinions and thoughts on the Agency’s proposed changes to that year’s QAP. However, this year SC made several substantial changes between the last draft and proposed final QAP and is not holding another public hearing for people to make comments (see below). The change which provides an unfair advantage to a small group of developers in the competition for federal money is the addition of points for having done Low Income Housing Tax Credit projects in SC that were placed in-service during the last 7 years. The QAP allows developers’ projects to qualify for 1 point for every project the applicant, or group of applicants associated with the project have developed in SC and placed in service since 1/1/2007 to 2/1/2014 up to a maximum of 3 points (3 projects).

Based on the last several years’ allocations of 9% credits, only a few developers (about 10 or so) have garnered awards consistently over the relevant period and will hold a competitive advantage over anyone who has not been so

fortunate. This means a developer will score more points on their application simply because they've done deals in SC previously, not because their deal is better, or more financially feasible than someone who hasn't garnered any, or as many projects in SC.

I understand that the final QAP hasn't been signed by the governor yet. I would very much appreciate it if you would make her aware of this issue before she signs the QAP. I appreciate your assistance and the Governor's consideration of this issue. Please don't hesitate to call me if you have any questions.

Thanks,  
Chris Rogers

**Christian L. Rogers**

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