



May 17, 2019

Indiana Housing & Community Development Authority
Rental Housing Tax Credit Program
30 S Meridian St, Suite 900
Indianapolis, IN 46204

RE: Comments to Draft Form A

To Whom It May Concern:

Thank you for providing the opportunity to give comments on the draft Form A for the 2020-2021 QAP. Keller Development, Inc. respectfully offers the below comments on the current draft of Form A:

General Comments:

- Self-Score points should not be entered via drop-down box; this eliminates the ability to self-score partial points for scoring categories that are proportional to the number of units that qualify for the category.
- Text entered within the yellow boxes is blue and black; it would be nice to have all data entered by applicant show up as blue.

Comments on Specific Items

- Page 3 – “Eligibility” is misspelled; text does not wrap in former “notes section” in boxes G-I for Sections C “Not-for-Profit Participation,” Section F “Issuance of 8609,” and Section D “Minimum Unit Sixes”
- Page 4 – Rents Charged - needs to include 20%, 40%, 70%, and 80% AMI; drop-down box options are all combined into one option.
- Page 7 – Federally-Assisted Revitalization Award – should include 2-point option for partial Promise Zone points
- Page 8 – Location Efficient – Should have a 2-point option for lacking a grocery store
- Page 8 – Opportunity Index – Should have all point values between 0 – 6
- Page 9 – Certified Tax Credit Compliance Specialist – Management needs 1-point options for partial points
- Page 9 – MBE/WBE/XBE – Should have all point values between 0-4 including 0.5 point increments

- Page 10 – Tenant Investment Plan – Each service level can score partial points, and 2 is not necessarily the maximum score for any one service level.
- Page 12 – Text in footnote does not wrap.
- Page 13 – Text in box f. does not wrap; text in footnote does not wrap.
- Page 14 – Text in footnote does not wrap.
- Page 19, Item 2 – Second option should state “Applicant is to acquire the property...”
- Page 24, Item 8 – Remove reference to ribbon color
- Page 25 – Text in footnote does not wrap.
- Page 28 – Text in Section Q. “Certified Tax Credit Specialist” does not wrap. Text in footnote does not wrap.
- Page 29 – Text does not wrap in 5. “Community Participation.”
- Page 30, Internet Access – Free wi-fi access in a common room is not described as a bonus point in the QAP. Providing this gains one additional point as long as any of the other scoring options are selected.
- Page 31 – 20% & 40% AMI rent formulas do not correctly reference utility allowances. 40% AMI listed as “400% AMI”
- Page 32 – Utility allowances are not populating from page 31.
- Pages 33 & 34 – “Annual Income” box is not large enough to show income numbers greater than five digits long with “#####” appearing instead of the actual amount.
- Page 35 – Add line for internet expense
- Page 37 – Text in footnote does not wrap.
- Page 38 – Text in footnote does not wrap.