February 6, 2025

Alan Rakowski  
Director of Real Estate Allocation  
Indiana Housing & Community Development Authority  
30 South Meridian Street, Suite 900  
Indianapolis, Indiana 46204

Dear Mr. Rakowski,

Thank you for the opportunity to provide written comments on Indiana’s draft 2026-2027 Qualified Allocation Plan (QAP). Dominium also appreciates IHCDA’s recent outreach efforts through the convening of a draft QAP public hearing. On behalf of Dominium, I respectfully offer the following comments for staff consideration in the finalization of the QAP.

**Funding Limitations**

Dominium supports increasing the maximum request for tax-exempt bonds. While we understand IHCDA’s objective of distributing scarce resources across the state and recognize that the 55% limitation on applications has proven to be a successful and efficient model in more than a dozen states with oversubscribed volume cap, increasing the maximum request would allow IHCDA to better respond to the current financing environment and encourage developments to achieve economies of scale.

The shallow subsidy and high fixed costs associated with bond-financed developments have only been exacerbated by current market conditions. As our team continues to explore opportunities in Indiana, the maximum bond request has been a limiting factor in feasibility assessments, particularly given persistently high borrowing costs. Increasing the maximum request would enable developers to spread fixed costs across more units, improving overall project viability.

Additionally, the development community dedicates immense time and resources to individual projects, often encountering delays due to zoning and land entitlement processes. A higher maximum request would help mitigate these pressures and facilitate the development of more housing in communities that welcome our residents.

**Underwriting Limitations**

As a vertically integrated developer and property manager, Dominium has a proven track record of operational success that justifies alternative underwriting assumptions regarding operating expenses, rental income growth, and replacement reserves. While we understand that these criteria help IHCDA ensure the financial stability of awarded developments, we encourage IHCDA to implement a waiver process that allows developers to demonstrate performance consistent with alternative assumptions. Alternatively, IHCDA could accept letters from lenders or equity providers affirming the use of such assumptions based on real-world financial data.

Lastly, the draft QAP’s limitation on maximum deferred developer fees similarly restricts financial feasibility. Deferred developer fees are a critical tool for bridging funding gaps, particularly in the current financing environment. By capping the amount that can be deferred, IHCDA may unintentionally hinder the ability of developers to move projects forward—especially those facing high upfront costs or gaps in soft funding. Allowing greater flexibility in deferring fees would enhance financial feasibility, ensuring that more developments can reach completion and provide much-needed affordable housing to Indiana communities.

I appreciate your consideration of these comments. If you have any questions or would like to discuss these items further, please do not hesitate to contact me at (214) 666-4530 or via email at [khayree.duckett@dominiuminc.com](mailto:khayree.duckett@dominiuminc.com).

Sincerely,

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