



PO Box 40177
8801 River Crossing Blvd.
Suite 200
Indianapolis, IN 46240
T 317.469.0400
genebglick.com

February 3, 2025

Alan Rakowski
IHCD
30 South Meridian, Suite 900
Indianapolis, IN 46204

Dear Alan:

Please note the following comments for your consideration on the 1st draft for the 2026-2027 Qualified Allocation Plan.

First, here are some changes that we are happy to see IHCD make in this new QAP:

1. We strongly support bringing back the large city set aside and are very happy to see that back in this new two year Qualified Allocation Plan.
2. We strongly support the elimination of the general set aside for this two year cycle and the reallocation of the potential credits to increase the size of the remaining set asides.
3. We appreciate the removal of unit entry overhangs as a minimum design feature for rehabilitation projects. It is not fiscally feasible or prudent to add new intrusions and small overhangs to existing townhouses.
4. We support the clarifications around smoke detectors and CO detectors in the NSPIRE habitability requirements.
5. We support the two open rounds for non competitive bonds. We feel that this change will maximize IHCD staff time by not having an open, rolling round.

Here are some suggestions on other scoring items in the draft:

1. We are disappointed to see the removal of the CORES certification as a point category. *CORES certification recognizes owners and third party providers that have developed a robust commitment, capacity, and competency in providing resident services coordination in affordable housing opportunities.* IHCD should consider bringing back that point category.
2. If that is not feasible, IHCD could consider recognizing the value that CORES certification has for resident services in another point category, specifically The Resident Service Coordinator for Supportive Housing. In addition, to supportive housing projects receiving 2 points in this category for having a 20 hour a week dedicated Resident Service Coordinator onsite or a MOU with a third party provider



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who is on site for 20 hours a week, we would like you to consider an additional bullet point:

For those owners with CORES certification, providing a dedicated Resident Service Coordinator to work at least 20 hours a week onsite. The coordinator must have dedicated office space at the development.

An additional comment is that IHCDCA could consider adding fees to support its construction inspections. IHCDCA has one inspector doing all of the pre-inspections, post-inspections, 8609 inspections and many other inspections that are needed. Other states around Indiana, have a larger inspection team. Our experience has shown positive insights can be had from on site inspectors that are able to visit a site under construction more frequently. In particular, Kentucky Housing Corporation supports this by charging a small inspection fee of \$1250 per property while applications are under review. Additionally, KHC charges a 1.75% fee of annual credit amount for each deal that closes to support its Construction Inspection Team.

IHCDCA, its staff and its tax credit team work incredibly hard. We appreciate all the things that you do to support affordable housing efforts in Indiana.

If I can provide clarifications on my comments, please let me know.

Thank you,

Janine Betsey
Director, Tax Credit Development