



North Carolina Department of Health and Human Services

Pat McCrory
Governor

Richard O. Brajer
Secretary

Jessica L. Keith
Special Advisor on ADA

November 2, 2015

Mr. Scott Farmer
Title
Housing Finance Agency
3508 Bush Street
Raleigh, North Carolina 27609
bsfarmer@nchfa.com

Dear Mr. Scott Farmer

Thank you for the opportunity to comment on the upcoming Qualified Application Plan (QAP). We would like to extend our thanks to the Housing Finance Agency at large for acting as partners in addressing the issue of housing for individuals with disabilities. We have reviewed the Qualified Allocation Plan, and would like to submit the comments that follow on the second page of this correspondence.

We are very thankful about the inclusion of points for counties where persons from Transitions to Community Living Initiative have stated that would like to reside and showing priority for development for areas in need of housing in support of the Department of Justice Settlement. We look forward to continued partnership, and hope that the comments provided will assist the State in meeting its obligations under the Americans with Disabilities Act and Olmstead.

Sincerely,

Jessica Keith
Special Advisor on ADA

www.ncdhhs.gov

Tel 919-855-4800 • Fax 919-715-4645

Location: 101 Blair Drive • Raleigh, NC 27699

Mailing Address: Mail Service Center 2001 • Raleigh, NC 27699-2001

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USDA RURAL DEVELOPMENT

Page 6: There is special consideration to USDA rural development. Are there other funding streams that could be given special consideration? HUD? CDBG?

NONPROFIT AND CHDO SET-ASIDES AND LIMITS

Page 7: In the non-profit section it appears that at first non- profits are given priority and then there are limits of only 20% of all awards- could this limit be increased from 20% to more?

COUNTY AWARD LIMITS AND INCOME DESIGNATIONS

Page 7: Award Limits: They only allow 1 project per county. In areas where the state is seeing significant need would could we consider more than one per county- examples Wake and Mecklenburg

AMENITIES

Page 11: consider adding public transportation as primary amenity

SITE SUITABILITY

Page 13:

Requirements around high traffic corridor and railroad tracks may inadvertently add to transportation issues.

MAXIMUM PROJECT DEVELOPMENT COSTS

Page 15: It appears as if developers will lose points for serving persons with severe mobility impairments- while the entire complex should not be developed for only individuals with disabilities. Individuals with severe mobility impairments are covered under ADA and negative points should not be assessed for this item.

MANAGEMENT EXPERIENCE

Page 18: "be requesting Key Program assistance timely and accurately"- Consider utilizing this as a way to document vacancies and ensure notification of unit turnover

TARGETING PLANS

Page 22: Tiebreaker Criteria: Please consider adding the section on Olmstead and following the Credit and Criminal History policy as part of the Tiebreaker Criteria?

Page 22: Could HFA add points for access to amenities in the counties identified by DHHS

Page 22: Could HFA consider a letter of support in early stages of site selection from LME/MCO leadership that the site is accessible for individuals in TCLI population.

Page 22 Could HFA consider asking the developers for an affirming statement and plan on this priority and other disability populations?

SMOKE FREE HOUSING

Page 27:

This disproportionately impacts the TCLI population and could result in evictions. Consider developing a set aside for smoking or removing this requirement.

