

HOME & NHTF Public Comments & Responses

2/14/2022

Comment: SOS Care submits the following comments on the draft 2022 Annual Action Plan under the State Consolidated Plan for Housing and Community Development; S.C. State Housing Finance and Development Authority; on behalf of individuals with developmental and intellectual disabilities and their families across South Carolina.

SOS Care is a 501(c)3 direct provider of housing and supportive services to adults with disabilities in South Carolina. It is the developer of Oak Tree Farm, a community designed to provide 130 affordable rental units to low-income individuals with disabilities in the city of Conway, S.C.

According to SC Employment First, South Carolina currently ranks 6th in the nation for unemployment of individuals with disabilities. As a result, most adults with disabilities in our state are unable to afford housing and live with family members. Only a few emergency placements in primarily congregate settings are available to adults with disabilities currently through the state Dept. of Disabilities and Special Needs. Therefore, adults with disabilities in South Carolina are at high risk of homelessness. Fundamentally, they also lack access to opportunities for independent, inclusive community living.

New construction of additional, affordable rental housing for individuals with disabilities is a critical need in all communities across our state. On behalf of low-income individuals with disabilities, SOS commends the draft Plan's designation of a 1a priority to construction of affordable rental housing in our state.

In order to live as independently as possible within our communities, the majority of adults with disabilities also require highly specialized supportive services. These include case management, education services, housing counseling, employment assistance and job training, mental health services, and life skills training designed especially for adults with disabilities.

SOS is one of a handful of providers of customized employment services and life skills training for individuals with disabilities across our state. To support our citizens with disabilities in affordable housing, we must address the critical need for specially designed supportive services for individuals with disabilities across South Carolina. SOS encourages the inclusion and elevation of these supportive services as a priority in the draft Annual Plan.

Thank you for accepting our feedback to the draft Annual Plan.

Sincerely,
Pierre Rattini, Board President and Sarah Pope, CEO
SOS Care, Inc.

<https://soscaresc.org>

Response: The 2022 Small Rental Development Program (SRDP) will continue to incentivize the development of supportive housing by setting aside 20% of the funding available for permanent supportive housing developments of which, a minimum of 25% of the units must be designated for persons with disabilities in need of supportive services.

Comment: On Page 68, under AP 85 Other Actions, note is made of the LIHTC program. I object to this program awarding bonus points based upon a project's development in an Opportunity Zone. The Opportunity Zone, a federal construct that was heavily politicized in determining what areas of a county would be included, skews the more important scoring factors of the QAP criteria, which generally focus on livability, sustainability, and quality of design and construction. A particular proposed development in Beaufort has been the top scoring project for multiple years, only to fall out of the top two positions awarded once 5 bonus points are awarded to competing, lower scoring projects located in the Opportunity Zone, this year by a single point. This is inequitable and does nothing to assist the development of affordable housing units. Please remove this arbitrary bonus system from the QAP.

Response: SC Housing is not allocating any HOME or NHTF dollars for the 2022 Low Income Housing Tax Credit (LIHTC) program. The public comment period for the 2022 Qualified Allocation Plan (QAP) was held from September 27, 2021 – October 15, 2021. Governor McMaster signed the 2022 QAP on January 11, 2022 and therefore, no revisions will be considered until the 2023 program year.