



COMMONWEALTH OF VIRGINIA  
*Virginia Board for People with Disabilities*

**John Kelly**  
*Chair*  
**Charles Meacham**  
*Vice Chair*  
**Margaret Disney**  
*Secretary*  
**Heidi L. Lawyer**  
*Executive Director*

*Washington Building, Capitol Square  
1100 Bank Street, 7th Floor  
Richmond, Virginia 23219*

804-786-0016 (TTY/Voice)  
1-800-846-4464 (TTY/ Voice)  
804-786-1118 (Fax)  
info@vbpd.virginia.gov  
www.vaboard.org

September 24, 2012

Mr. Jim Chandler  
Director of Low Income Housing  
Tax Credit Programs  
Virginia Housing Development Authority  
601 South Belvidere Street  
Richmond, Virginia 23220

Dear Mr. Chandler:

Thank you for the opportunity to provide comments regarding the proposed 2013 Qualified Allocation Plan (QAP) for the Low Income Housing Tax Credit Program (LIHTC).

As Virginia's Developmental Disabilities Planning Council, the Virginia Board for People with Disabilities recognizes the importance of pursuing integrated permanent supportive housing opportunities. The fact that thirty-five states applied for 2012 Section 811 Project Rental Assistance (PRA) funding demonstrates the significant need and importance of leveraging future Section 811 PRA funding opportunities. With this opportunity in mind, the following recommendations are submitted for consideration:

- Establish a mandatory set-aside 5% to 10% of units, consistent with best practices in Louisiana and North Carolina, to provide independent living opportunities for persons in the Department of Justice Settlement Agreement target population to receive credits. This condition is subject to the receipt of Section 811 PRA funding.
- Adopt financing strategies that capitalize operating reserves, or similar mechanisms, to support small set-asides of Permanent Supportive Housing units in LIHTC properties. We understand that the Pennsylvania Housing Finance Agency has successfully adopted this approach.

The Department of Justice (DOJ) Settlement Agreement requires the Commonwealth of Virginia to serve individuals in the target population in the most integrated setting consistent with their informed choice and need. The agreement calls for the Commonwealth to facilitate individuals receiving home and community-based (HCB) waivers under the Agreement to “live in their own home, leased apartment, or family’s home when such a placement is their informed choice and the most integrated setting appropriate to their needs.” We believe that including the recommendations above in the 2013 QAP is consistent with the Commonwealth’s obligation under the Settlement.

Thank you for the opportunity to provide comment. Please don’t hesitate to contact me if we can provide additional information or clarification.

Sincerely,



Heidi L. Lawyer

Cc: Susan Dewey, Executive Director, VHDA  
John Kelly, Board Chair  
Angela Sadsad, Chair,  
Housing and Transportation Committee  
Teri Barker-Morgan