



April 9, 2012

Louisiana Housing Finance Agency
2415 Quail Drive
Baton Rouge, Louisiana 70808

Attn: Ms. Brenda Evans, Program Director

Re: 2013 Qualified Allocation Plan Comments

The Case for Building Permanent Housing for Louisiana's Homeless and Disabled Veterans

The plight of Louisiana's Veterans, their need for support for the transition from frontline service in Iraq and Afghanistan to civilian life, and struggle to cope with service connected disabilities including physical injuries, traumatic brain injury, post-traumatic stress disorder, depression and other issues, has been identified as a pressing need by Volunteers of America (VOA).

VOA, with local offices in New Orleans, Shreveport and Baton Rouge, has forged a close working relationship with the United States Department of Veteran Affairs (VA), and currently serves many veterans statewide, with the provision of case management, counseling, employment training and other social services. Utilizing funding from VA, Volunteers of America also operates transitional housing, which provides up to two years of subsidized housing with on-site services.

In tight housing markets such as Shreveport and New Orleans, veterans who have graduated from VOA's transitional housing programs have faced new periods of homelessness, unable to find affordable housing and housing with social service support. In Shreveport, VOA has proposed to address this need with the construction of Riverscape Apartments, a 56 unit apartment complex located within walking distance of the Overton Brooks VA Medical Center (VAMC)

Riverscape has committed social support from Overton Brooks VAMC, financing support from the City of Shreveport, rental subsidy support from the Housing Authority of the City of Shreveport and documented support from neighborhood organizations and leadership. Riverscape Apartments, however, did not score enough points under the Louisiana Housing Finance Agency's (LHFA) FY 2011-2012 qualified allocation plan, to receive required tax credits necessary to build this critically needed housing. Changes to this year's QAP scoring can allow projects such as Riverscape Apartments to receive tax credit funding and move forward to construction start.

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Proposal to Prioritize Housing for Homeless

Volunteers of America requests LHFA adoption for building housing for homeless and disabled veterans as a statewide priority under this year's pending FY 2013 Qualified Allocation Plan.

VOA proposes that the LHFA create a new set aside pool with a minimum of \$2 million in tax credits, to fund housing projects serving homeless and disabled veterans. In addition, LHFA can assign additional points under the QAP scoring in support of housing for homeless and disabled veterans within the general pool.

Based on VOA's local and national work with homeless and disabled veterans, we believe that the following project design components should be incorporated into a statewide priority for veteran housing:

1. Support from local VA Medical Centers: Successful projects will depend on health care and social service support for homeless and disabled tenants by the local VA Medical Centers. Projects should be required to have written support from VA Medical Centers.
2. Owners experienced working with VA Medical Centers: Given the complexities of working with the VA, developers must have previous experience working in collaboration with VA and serving the needs of homeless and disabled veterans. Owners, with over a 50% ownership stake, should be required to have a minimum of three years' experience working with VA funded programs targeting support for homeless and disabled veterans. Additional points should also be awarded to Owners currently operating transitional housing programs for homeless and disabled veterans funded by the VA.
3. Location: Projects located within one mile of a VA Medical Center or clinic, and/or are easily accessible by public transportation and/or the developer will provide private bus service to, should be prioritized.
4. Building Type: Use of new construction permits a project design which meets all tenant needs for social services space, common spaces and security within a development, therefore, we believe new construction should not be ranked lower than rehabilitation or adaptive re-use projects.
5. Architectural Design: Highly ranked projects should include numerous offices for delivery of social services to tenants, classroom space, group meeting rooms and outdoor recreational areas. Sponsors must demonstrate that proposed on-site services and programs fit the proposed common space design.
6. Rental Subsidies: A commitment for Project Based Vouchers or other project based rental subsidies should be required for all units serving homeless and disabled veterans.

7. Percentage of Units Set Aside for Homeless and Disabled Veterans: Congregating veterans together has been shown to have a positive impact with veterans struggling with service connected disabilities. We recommend that projects prioritize a minimum of 50% of units for homeless and disabled veterans, with additional points for projects serving higher percentages.
8. Housing Prioritized for Chronically Homeless Veterans: We recommend that state resources target the neediest group of homeless and disabled veterans, those families and individuals meeting HUD's chronically homeless definition. That definition includes persons with disabilities who have either experienced homelessness for a year or more, or who have been homeless four or more times over the past three years. Projects should be required to reserve a minimum of 25% total units for the chronically homeless.

VOA believes that by utilizing these, or similar criteria, will allow LHFA selection of high quality, permanent housing projects required to meet the many needs of homeless veterans.

We look forward to the LHFA becoming a leader in support of Louisiana's veterans in need.

Thank you for your kind consideration of these issues.

Sincerely,

Debbie Cary

Debbie Cary

Director, Affordable Housing Development