Homeownership Super NOFA (HOSN) Public Comment Summary

The following table captures the public comments received on the HOSN draft guidelines during the public comment of June 7 -June 27.2022 and the Department's response to the comment.

	Topic	Comment	Department
1	Eligible Uses	CalHome, as currently configured, provides a dramatically streamlined delivery system for homebuyer mortgage assistance which needs to mirrored in the Serna guidelines. In CalHome, qualified recipients make underwriting decisions, coordinate and manage loan closings, and maintain reuse accounts locally under a long term contract with HCD. This arrangement reduces HCD staff time and countless delays by effectively reducing the amount of parties that need to “touch” the transaction with a single borrower, with no loss of compliance control for the state. The Serna homeownership program needs to allow for the same types of agreements to more efficiently provide mortgage assistance to farmworker households. At minimum the CalHome guidelines sections 7723 (Loan Servicing) and 7724 (Reuse Account) need to be added to Serna guidelines to effectuate this change.	Incorporated
2	Activity Delivery Fees	Establishing maximum ADF amounts in the NOFA process is imperfect and does not allow for adequate stakeholder input. Current rates for Owner-Occupied Housing Rehabilitation programs, for instance, are not adequate for the costs of delivering a program. While it is reasonable to have the flexibility to establish these amounts in the NOFA process, there needs to be some mechanism for periodic input from program operators as to the correct ADF maximum.	HCD staff will seek stakeholder input on ADFs for the next round of funding.

3	Income Levels	This section states that CalHome recipients must be low-income. Currently CalHome income guidelines utilize HUD income guidelines, which conflict minimally with USDA Rural Development (RD) income guidelines that aggregate low and very low income limits by clusters of household sizes. For RD mutual self-help housing providers, this creates barriers when a family is eligible for their first mortgage through RD yet does not qualify for the CalHome assistance. HCD should accept RD income limits when that program is utilized for first mortgages. Mutual self-help housing is an essential tool for homeownership in rural California, providing a long term subsidy for numerous borrowers, so CalHome and Serna should both be compatible with it. The HUD Self-Help Opportunity Program (SHOP) has adopted reciprocity with USDA for this very reason. [NOTE: Commenter made same comment for Serna]	HCD staff is interested in increases in the permitted income levels. We built flexibility into the guidelines and will consider this for the next round of funding.
4	Award Date	High Priority "Date of Award" needs to be defined. This date is critical to understanding and executing performance goals. Currently the department uses the date to commence performance goals as the date awards are announced. We would suggest that you consider defining "date of award" as the date the Standard Agreement is fully executed by all parties (Rationale: is consistent with State contracting law). Currently the Department uses the date of Department correspondence informing each applicant of the final (post appeal) award decisions; while this is a tracible date for audit purposes it is not a state contracting best practice (and may be contrary to contracting law) as it does require awardees to perform work and put them at risk of incurring costs before they have an executed contract. The guidelines currently exclude from eligible expenses any expenses that occur after the Award Date, but before the Standard Agreement Execution Date. This can be detrimental to project financing and cash flow. Using the date the SA is executed will allow for flexibility with ever-increasing permitting and construction delays imposed by local jurisdictions as well as any HCD delays in processing.	Incorporated
5	Cash-Out Refinance	The CalHome policy regarding refinancing should be amended to allow limited cash-out in certain hardship conditions, such as when the owner needs a roof replacement and does not have savings at hand. To disallow this puts owners in position of losing habitability and their home. A careful screening of subordination requests is a given, the owner would not be burdened.	Cash out refinances are not allowed in any HCD state or federal program. If a homeowner has equity in their home, they should be able to

6	Eligible Costs	This section includes "Onsite improvements related to eligible housing development" which we construe as allowing house construction costs in addition to land purchase and development. Further, at 7719 (4), ineligible costs do not include "development of new Homeownership projects." We strongly support including vertical construction of single family homes as an allowed activity with Project Development Loans. For unexplained reasons, recent implementation of the CalHome program has disallowed "unit construction costs" in NOFA issuance, even though early program implementation allowed it. This is an unnecessary restriction, as it reduces the effectiveness of the assistance for nonprofit developers who own and develop land as well as actively construct new homes, including mutual self-help housing providers.	HCD is not well-suited to monitoring construction and therefore prefers to provide permanent financing rather than construction financing in all our programs.
7	Definitions	The definition for a "Homeownership Development Project" needs to be modified to allow for the full range of projects that are legally eligible for CalHome financing and not only traditional single-family new construction subdivisions. These excluded, but legally eligible, projects, include rehabilitation, conversion and adaptive reuse projects, and manufactured housing subdivisions, as well as new stick-built new construction. They also include attached units that will be owned through common interest developments (e.g.., condos, PUDs, co-ops, etc.) plus mutual housing associations. Roughly 2/3rds of the owned homes in California are in common interest developments. These homes are typically less expensive than traditional single-family homes, especially in more costly areas of California. By limiting Cal-Home to traditional single-family subdivisions, you preclude the program from being used in these costly areas. For an example of what is precluded, some Habitat for Humanity's have developed and rehabbed condominium projects in more costly areas of California.	Incorporated
8	Definitions	CCR §7719(b)(4) should be modified as follows to be consistent with defined terms: "Unit construction costs, except in Owner-Occupied Rehabilitation Local Programs or for construction period expenses for development of Homeownership Development Projects."	Incorporated

9	Extensions	7759 Performance Goals Subsection(b) Homeownership Development Projects: EXTENSIONS: HCD should allow for approved extensions. Allowing this flexibility benefits HCD staff and the Developer should delay issues arise. Often, there are severe delays in communication and receiving accurate information.	Subsection d of the Performance Goals section already allows for extensions and applies to all types of projects, including Homeownership Development Projects.
10	Allocations	Include a mechanism to fund projects with Serna before CalHome. Due to the substantially different housing costs in urban and rural communities, we advocate for projects that could qualify for CalHome or Serna to be funded via Serna first. CalHome has historically featured heavy oversubscription and appears likely to do so in future. For that reason, funding dual eligible projects with Serna first will help CalHome reach a mix of projects in both urban and rural areas.	HCD is required to ask applicants which funding source they are applying for. Our hope is that, with the two programs being combined in the Super NOFA, more applicants will become aware of and apply for Serna funds, reducing CalHome oversubscription.
11	Allocations	If the funds cannot be allocated appropriately, recipients should not be penalized. Rather, recipients should have the option to move the money to another activity or return the funds. These returned funds can be re-allocated to another entity or activity.	Recipients who have received funds for multiple CalHome program activities can request permission to move unused funds from one activity to another. Recipients cannot move funds from an activity they were funded to do to an activity they were not funded to do, as they may not meet the eligibility requirements for the unfunded activity. In general, applicants are expected to only apply for funds for the amount of activity for which they can ensure demand.

12	Limited Equity Housing Cooperatives	Please consider clarifying how CalHome funds can be used for Mutual Housing. Locally, we are looking at Limited Equity Housing Cooperative (LEHC) models, and it seems like this type of housing should meet the CalHome definition of Mutual Housing. If so, can CalHome be used as a deferred blanket loan for LEHCs?	Please contact Department staff if you have a specific question about how to use CalHome for Mutual Housing.
13	LTV	The maximum LTV for rehabbed or reconstructed homes should be increased to at least 110%.	Over-encumbering a property could lead to a hardship for the borrower plus risk for the program. Max LTV for rehab or reconstruction is 105%.
14	Definitions	The definition for a "Manufactured Housing" should also state that CalHome loans may be used to develop manufactured housing subdivisions. This statement may also be appropriate in other sections.	This would require significant additional program development. HCD will consider this for the next round of guidelines.
15	Manufactured Homes	The ability to install a permanent foundation on a manufactured home should added to the definition of "Rehabilitation." If a manufactured home owner also owns the land beneath their home, adding a permanent foundation can generally qualify the home for more favorable single-family home financing rather than more costly chattel financing. Converting a manufactured home to be an improvement to the real estate can increase the value of the home and reduce the need for subsidy.	Incorporated
16	Manufactured Homes	CCR §7718(a)(2) should not be limited to the rehabilitation or replacement of manufactured homes not on a permanent foundation. There are no legal or practical reasons why manufactured homes that are installed on a permanent foundation should be precluded from CalHome financing.	Manufactured homes that are installed on a permanent foundation should be reclassified as "real property," at which point they will be eligible for CalHome funding as a single-family home, rather than as manufactured housing.

17	Targets	A new paragraph (e) should be inserted in §7726 that complies with the requirements of HSC §54006(g). This HSC section requires that at least thirty million dollars ($30,000,000) of the amount provided by Prop 1 of 2018 shall be used "to provide grants or forgivable loans to assist in the rehabilitation or replacement, or both, of existing mobilehomes located in a mobilehome or manufactured home community." Appropriate language for CCR §7726(e) might be: "All CalHome program assistance that is provided to assist in the rehabilitation or replacement of existing mobilehomes located in a mobilehome or manufactured home community, as required by HSC §54006(g), shall be provided in the form of a grant or forgivable loan."	HSC 54006(g) only applied to the $30 million mobilehome set-aside provided by Prop 1 of 2018. Any funds other than those funds must be subject to CalHome statute, which only states that "Financial assistance may be provided in the form of a secured forgivable loan to an individual household to rehabilitate, repair, or replace manufactured housing located in a mobilehome park and not permanently affixed to a foundation." (50650.3(c)(1)). Included language to that effect in the guidelines.

18	Technical Assistance	During the application process for the last three NOFAs the Department has provided webinar training during which they solicited questions from potential applicants. Sometimes they were able to answer the questions on-the-spot and other times they needed to research the question but promised the submitter a response. The Department has always graciously offered to answer any questions and recommended they be submitted via email. Unfortunately, they do not make those responses available to all potential applicants thus providing the original submitter an “unfair advantage” in the application process. This would be easily remedied by publishing ALL questions and answers on the CalHome website (or other method easily accessed by applicants) putting the onus on applicants to make themselves familiar with the information. We would suggest adding the following language to the end of Section 7753: (c) During each NOFA cycle, the Department shall publish, on the CalHome website (or other similar site with public access), all responses to questions or requests for clarification received from potential applicants. The Department shall establish a cut-off date after which no further responses shall be made. Publication must be made in time for all applicants to take advantage of this information prior to submitting their own application.	The Department will put this into practice to the best of our abilities.
19	Disbursement	Recommend eligible activities are included for reimbursement after Award Date to accommodate unexpected delays on the execution of the Standard Agreement. Currently, eligible expenses are excluded if they occur after the Award Date, but before the Standard Agreement Execution Date. This can be detrimental to project financing and cash flow.	There is too great a legal risk to the Department to allow reimbursement of expenses incurred before execution of the Standard Agreement. The Department is making great efforts to speed up our Standard Agreement execution process.

20	Targets	The NOFA should clearly state that a specific amount of CalHome funds are set-aside for the rehabilitation or replacement of manufactured homes in mobilehome parks that are not on permanent foundation. This set-aside is a statutory mandate that is required by HSC §54006(g). The NOFA should clearly state the rural set-asides for both the CalHome and Serna programs. One Page 3, the second eligible Serna homeownership activity should be reworded: 2. Owner-Occupied Rehabilitation, "including the replacement of manufactured homes," The maximum per unit limits for Serna reconstruction and replacement housing should be $250,000 to be consistent with CalHome.	Incorporated
21	Site Control	Our County is considering partnering with a local city in our jurisdiction which has a site that may be suitable for the construction of new for-sale homes for ag workers. The County is interested in applying for Joe Serna funds for this project and the City has site control. Please allow the City to be the entity which has site control if they provide a letter so stating, even if they are not the applicant.	Guidelines allow "Other forms of Site Control that give HCD equivalent assurance that the project will be able to proceed without inordinate delay." This situation could fall under that clause.
22	Stacking	The NOFA should also clearly state that while CalHome and Serna funds may both be used to assist the same program or project, only one of the programs may be used to assist any individual unit. No double dipping will be allowed.	Incorporated
23	Eligible Applicant	Applicants who apply for Homeownership Project Development Loans and convert their loan to a grant to provide Mortgage Assistance to individual homebuyers should also meet the eligibility requirements for Mortgage Assistance programs.	Incorporated
24	Scoring	Habitat for Humanity Greater San Francisco recommends that HCD establish a more granular weighting system to evaluate Capability for Homeownership Development Project Loans (10, 20, 30, 40), and raise the unit threshold for a maximum 40 point score from 5 or more to 10 or higher. We believe that production of five homes over 4 years is too low for a new home production threshold for receiving the highest point score. An alternative scoring system could be: 10 points for 2 homes; 20 points for 3-4 homes, 30 points for 5-9 homes, and 40 points for 10 or more.	Changed from 'units' to 'projects'

25	Scoring	For mortgage assistance, owner-occupied rehab, etc. it seems that the threshold of only having to do 11 or more units in the previous 4 years to get the maximum 40 points is too low. That is less than 3 units per year. The threshold should be at least 10-15 units per year to show that an applicant truly has the capability to be able to spend the funds in a timely manner.	The Department wants newer and smaller programs and jurisdictions to have the opportunity to seek CalHome funding.
26	Scoring	Reduce timeframe from 4 years to 2 years in criteria defined. Increasing the threshold of the number of loans funded from 11-16 units in 4 years to 11-16 units in 24 month period acknowledges increased capacity and efficiencies of grant utilization. Therefore, the other levels should be changed to reflect these numbers: 2-5 units in 2 years earns 20 points and 6-10 units in 2 years earns 30 points. Also, award 5 bonus points to the organizations who exceed 16 units in 24 months.	The Department wants newer and smaller programs and jurisdictions to have the opportunity to seek CalHome funding.
27	Scoring	CalHome Guidelines language currently provides sufficient flexibility to implement these suggestions without any revisions to Guideline language. For CalHome and Serna Owner-Occupied Rehabilitation Programs: Under OOR Community Need there are currently 4 factors that determine an applicant's score including: •Age of Housing Stock. •Percent of homeowner Households that are in poverty. •Percent of homeowner Households that are low income. •Percent of homeowner Households occupying overcrowded housing The "Age of Housing Stock" and "Percent of homeowner households occupying overcrowded housing" factors are also used in OOR Feasibility scoring. This results in those factors having excessive weight in determining total score. To correct this overweighting problem, we recommend deleting the "Age of Housing Stock" and "Percent of homeowner households occupying overcrowded housing" factors from the OOR Community Need scoring (which still leaves 2 valid factors) and only using them for determining the OOR Feasibility score. The end result would be: Recommended OOR Community Need factors: •Percent of homeowner Households that are in poverty. •Percent of homeowner Households that are low income. Recommended OOR Feasibility factors (no change): •Age of Housing Stock. •Percent of homeowner Households occupying overcrowded housing	Incorporated

28	Scoring	Smaller jurisdictions are not correctly scored in the Community Need calculations of points homeownership projects or owner-occupied rehabilitation programs. The remedy is to use local data, rather than using county data to score all applicants. Using Fresno County data for the City of Orange Cove, for instance, dramatically undercounts the score that would otherwise be achieved by using city or census tract data. Relative need within county jurisdictions need to be accounted for.	Households look beyond just their immediate city of residence for housing opportunities. In addition,; too challenging to use local data
29	Scoring	High Priority 7755(b)(4) This section allows scoring for Community Revitalization (as defined) or projects that address legislative mandated priorities for use of funds or Rehabilitation Programs meeting certain criteria. The term “legislative mandated priorities” is undefined. During recent NOFA cycles the application did not even allow applicants to submit information to earn these points by explaining how they are meeting legislative priorities. We would recommend defining the term “legislative priorities” in the guidelines, for long term priorities, and the NOFA, for short term priorities (if any). Projects that directly address the defined legislative priorities could receive all or a portion of the evaluation points allocated to Community Revitalization upon submitting proof with their application.	Removed 'legislative mandated priorities" as it was too vague
30	Scoring	We propose points be reduced to 5 points. Rural communities are disadvantaged in the competition because they are rarely in areas defined as federal promise zones, choice neighborhood initiatives or opportunity zones.	Decided not to incorporate; rural set-aside assists rural communities
31	Scoring	Proposes 10 points for community revitalization. This is urban-biased, as projects in small, rural towns are rarely in areas defined as federal promise zones, choice neighborhood initiatives or opportunity zones.	Decided not to incorporate; rural set-aside assists rural communities
32	Scoring	Contributes to Community Revitalization: Based on the nature of the structure of any mortgage assistance program it is difficult for nonprofit organizations (like VCCDC) to meet this criteria for 10 points. We offer program throughout Ventura County for existing and new housing, and the general plans that address climate adaptation or resiliency are adopted per jurisdiction, not overall as one conglomerate of all cities. Therefore, we lose out on earning these 10 points automatically when applying for CalHome program funding. We recommend that you limit this category and associated points to project-specific applications such as those that are construction and/or development project categories.	Removed climate adaptation/resiliency criterion

33	Scoring	Current scoring is all-or-nothing. Consider allowing partial points for areas adjacent to OZs (e.g. bounded on 75% of area by OZs).	Decided not to incorporate; hard to implement especially for MA/OOR
34	Scoring	Consider basing scoring on the underlying criteria (e.g. around levels of poverty and segregation) rather than on the label (OZ)	Decided not to incorporate; hard to implement; prefer to use well-defined proxy metrics like opportunity zones
35	Scoring	Could there be the option to get points for high-resource areas?	Incorporated
36	Scoring	In past applications high costs areas are unfairly punished in the Feasibility scoring. For down payment assistance programs, these are the areas which make it harder for low-income first-time homebuyers to purchase and these are the areas where they need the help the most. A15	Cut the provision that based availability of homes for sale on the number of homes priced below $500,000.

37	Scoring	The current methodology for awarding points for Feasibility favors low cost areas over high cost urban areas; in recent CalHome rounds this has resulted in outcomes such as LA County applications receiving 2 points on the affordability measure included in that score versus 10 points for applications from San Bernardino and Riverside Counties. •HCD prioritizes CalHome funds for areas that their metrics determine a higher "feasibility" for home ownership only because the difference between renter and owner costs are smaller due to lower priced homes in those areas—essentially placing financial assistance where it is needed least. •In high cost urban and surrounding suburban areas, the inventory of affordable homes is very low, largely due to a lack of buildable land and a premium for living closer to employment centers. •In high cost urban areas, rental costs also are high, making it more difficult for low and moderate income renters to save money for down payment on a home. •This results in the "locked out" issue wherein low, moderate, and even higher income households cannot afford to buy a home. A review of Census data quickly shows that in LA County the majority of low and moderate income households are renters, while in outlying counties, the majority of that demographic are homeowners. •The proposed increase in the First-Time Homebuyer Mortgage Assistance per unit amount will make a significant difference in the "Feasibility" of applications for this activity from major urban areas. •Many of the low cost areas are poorly, if at all, served by regional mass transit, relegating homeowners in those areas to long car commutes. •The low cost areas are located long distances from the high cost urban cores with high concentrations of employment. Encouraging households to move to the lower cost areas by making mortgage down payment assistance more readily available is contrary to other HCD programs such as AHSC which seek to incentivize more affordable housing close to transit and employment centers. We will be submitting additional, more detailed information to the CalHome Program staff that will further demonstrate that the approach to scoring Feasibility needs to be reworked.	MA programs are very costly on a per-unit basis in high-cost areas. The best approach to increase affordable homeownership in high-cost areas in building new affordable homes. Therefore we removed the criteria that favor low-cost areas over high-cost areas specifically for activities that build new affordable homes.
38	Scoring	Remove this area of the application and the respective points awarded. We have proven that even in high cost areas of Ventura County we have been able to leverage funds and provide $1.9M in down payment assistance to low-income families.	See previous response

39	Scoring	I propose higher point values for 'Community Need', 'Contributes to Community Revitalization' and 'Volunteer Labor, Self-help Labor, or Youth Construction Skills Training Program' sections of the scoring sheet.	Point values have been re-balanced to better reflect state policy priorities
40	Scoring	7755(b) We recommend the minimum score to be considered for funding to be revised from 55 to 65 points as 55 points does not demonstrate an adequate combination of capability and need to carry out projects. Alternatively, given that the maximum points available will be different for Serna Applications as compared to CalHome Applications, and the possibility that the maximum score can change from NOFA to NOFA, you may want to consider expressing the minimum score as a percentage of the maximum (suggest 70% rounded to nearest 5 points)	Moved minimum score from guidelines to NOFA. Did not change minimum score. Low-scoring projects are rarely funded because program is over-subscribed.
41	Scoring	Increase the CalHome scoring transparency. In the past several NOFA rounds lower scoring applications have received awards while higher scoring apps went unfunded – this was due to geographic and special priority carve-outs (for mobilehome, etc.). While we understand the NOFAs are a competitive process, this makes it very difficult to assess where our application might stand and whether to invest the considerable resources necessary to prepare and submit the application. We assume many other jurisdictions are also facing continued staffing shortages and similar constraints that give rise to this concern. Example: for the 2021 NOFA we had 81 points (no award), while 14 applications with scores between 65-78 were funded.	Added much more detailed description of ranking process to NOFA.
42	Scoring	Overall, we strongly recommend you review and consider implementing these comments, as well as provide distinct point systems relevant for three category types in future grant application rounds. This will allow a level playing field and provide a more equitable distribution of funding. The three types of programs are: 1) acquisition/rehabilitation program; 2) mortgage assistance for first-time homebuyers program; and 3) project-specific/new development program. These three categories should not fall in the same point system as being proposed, yet should be distinct in a class by themselves with rating factors that make sense for each.	Decided not to incorporate. Need a way to rank applications against one another across programs.

43	Scoring	The Targeting for Serna Funds is very weak. Under the proposed guidelines it is possible that a project the serves absolutely no farmworkers can receive Serna funds. While this may not happen, some changes should be made to strengthen the program's targeting. First, the Serna program should have a threshold to ensure that most of the funds go to farmworkers. It can be either 1) at least half units assisted must be owned or purchased by farmworkers, or 2) at least half of the funds must be used to assist homes owned or purchased by farmworkers. Then, applications that will serve a higher percentage of farmworkers should get a funding priority. The points chart for Percentage of Units for Target Population on Attachment 2 - Page 7 should be modified. I suggest something like: % of FW Units - Points Less than 70% 0 points 70% to 79.9% 10 points 80% to 89.9% 20 points 90% or more 30 points.	Changed threshold to say 100% of units must serve ag households at < 80% AMI. Removed scoring.
44	Scoring	If additional points are awarded to jurisdictions which have a high number of ag workers, please allow Counties to restrict their application to their jurisdictions which have a high need.	Changed to number of OMS centers in service county to better reflect presence of agricultural workers.
45	Scoring	Specific to Serna: Giving points to counties that have a high a count of hired farm labor benefits communities with higher overall populations. Again, this is an urban bias that makes it very hard for small rural towns to compete, despite having high overall percentages of farmworkers.	Changed to number of OMS centers in service county to better reflect presence of agricultural workers.

46	Scoring	We would suggest that there exists a long-term legislative priority, already being implemented in other funding streams, that should be included in the guideline definition: projects located in Prohousing designated jurisdictions. Prohousing Jurisdictions is the program already established by the Department to provide priority processing or funding when applying for funds. This definition would officially add the CalHome program to the Prohousing Designation Program. We would also suggest that this prioritization be applied only to CalHome Mortgage Assistance, CalHome Development Project Loans, CalHome ADU/JADU, Serna New Construction, or Serna Acquisition of Manufactured Housing projects. Suggested language to accomplish that would add the following definition: Add 7716(?TBD??): Meets a "Legislatively mandated priority of funds" means any CalHome Mortgage Assistance, CalHome Development Project Loans, CalHome ADU/JADU, Serna New Construction, or Serna Acquisition of Manufactured Housing project if all units to be assisted with CalHome program funds are, or will be, located within a Prohousing Designated jurisdiction.	Adding points for jurisdictional applicants that have Prohousing designation.
47	Scoring	CalHome Guidelines, Article 10, 7755(b)(5)(D), Selection criteria, volunteer labor: CHIP believes that available points received for projects that meet volunteer/self-help labor requirements should not be influenced by a requirement that 15% of the units include an ADU, or by developing projects in a high or highest resource area as defined by TCAC/HUD opportunity or maps. CHIP is a USDA RD self-help housing grantee, and so we were required to build in small, rural areas that typically are not in high or highest resource areas. In fact, we see this requirement as having an urban bias, which does not support rural self-help housing. In addition, ADU's in a self-help housing development are impractical due to infeasible development costs and homebuyer affordability. A rural self-help housing grantee will likely receive points in this category only for the volunteer labor, not the other two areas that score points. As a result, very few points are awarded for volunteer labor/self- help housing projects, even though this is a proven approach (and often the only approach) to develop new, quality housing in rural areas that is affordable. We would recommend that full points be given in this category to applicants whose projects include volunteer/self-help housing components that meet CalHome's requirement, and that the other two criteria (ADU's and high resource areas) be put into a different category.	Removed ADU bonus. Combined high resource area with the other geographical criterion (Community Revitalization)

48	Scoring	Volunteer Labor: Based on the nature of the structure of any mortgage assistance program it is difficult for nonprofit organizations (like VCCDC) to meet this criteria for 5 points. We don't have opportunity to provide volunteer labor as part of our service offering and therefore we lose out on earning these 5 points automatically when applying for CalHome program funding. As a result, your 2021 CalHome awardees comprised one national organization receiving 55% of the total awards provided or roughly $34M in funding, which clearly received 10 points for having volunteer labor associated with their project applications. Organizations like VCCDC can't compete with those level organizations which set us an unfair competitive advantage to those with volunteer labor or self-help labor built into new construction project applications. We recommend that you have you limit this category and associated points to project-specific applications such as those that are construction and/or development project categories.	This category is statutorily required. Reduced points allocated from 5 points from 10 points.
49	Scoring	If scoring is reduced from 10 points to 5 points, please ensure equitability and ability for new construction applicants to compete for funding - need to promote production and do not want any unintentional consequences of a rating factor/point total to impede total new production funding allocations. - Understand if the rationale is to correct an overweighted factor for self-help applicants and also want to ensure this change does not disadvantage self-help applicants and or nonprofit developers overall.	Added new section with 5 points available to projects that add to the housing supply.
50	Funding Limits	Increase the limits for CalHome ADU rehab (reconstruction). The increased per unit limits for the owner occ rehab (reconstruction) should also be applied to Owner Occ ADU-JADU Rehab since the high cost of construction affects feasibility of both types of projects.	Incorporated
51	Funding Limits	Maximum Loan amounts: we are not sure why the per unit limit would be higher for PDL and Serna new construction ($250,000) than for maximum Mortgage Assistance ($200,000.) These should be consistent.	Construction of new units is very expensive and costs have only increased in recent years.
52	Funding Limits	In no case (PDL or MA) should assistance exceed 50% of the cost of a home.	Current limits of 40% of cost of home apply to MA and to PDLs that convert to MA.

53	Funding Limits	Maximum TA Amounts for Self-Help Housing – should be increased beyond $15,000, which has been in place for years, to be reflective of cost increases for staffing and overhead. Also, the maximum grant should be increased commensurately. We suggestion limits of $20,000 per unit for Technical Assistance with a grant maximum of $600,000, which would allow for a 30 unit project.	Incorporated