

2013 HOME Rule Change - State Impacts

State/PJ	"Last In" Policy	CHDO Capacity	4-year Completion Requirement
Illinois	May impact the ability to secure other funding commitments.	Orgs are losing CHDO status because of limited staff capacity and inability to use consultants after first year.	Will cause PJs to be significantly more conservative in their project underwriting.
Ohio	Funds are going to fewer projects for ease of compliance. Small projects are becoming unworkable for HOME funds. The ability to secure other funding commitments is also an issue.	To be eligible to receive a CHDO operating grant you have to be a current recipient of the HOME CHDO set aside. Only a handful will be current recipient making the program unworkable. The rules are the antithesis of intent of CHDO's in the first place.	Will cause PJs to be significantly more conservative in their project underwriting.
Michigan	May impact the ability to secure other funding commitments.	Orgs are losing CHDO status, leaving larger CHDOs to expand their footprint to operate in a larger area. We're also seeing larger orgs that do development but that did not formerly have CHDO status, considering becoming CHDOs.	This requirement will cause PJs to be significantly more conservative in their project underwriting.
Florida	Agrees with the above statement but notes that they have heard nothing from members.	Agrees with the above statement but notes that they have heard nothing from members.	Agrees with the above statement but notes that they have heard nothing from members.
Massachusetts	Heard no concerns from members.	Heard no concern from members.	Heard no concerns from members.
California	EBHO responded that they do not directly deal with HOME.	EBHO responded that they do not directly deal with HOME.	EBHO responded that they do not directly deal with HOME.
Connecticut	CHC says they don't have any problems with the rule changes because they only get enough HOME funds for one or two projects.	CHC says they don't have any problems with the rule changes because they only get enough HOME funds for one or two projects.	CHC says they don't have any problems with the rule changes because they only get enough HOME funds for one or two projects.
New Jersey	The last in requirement makes lining up other financing very difficult. It is creating conflicts with other financing sources that also want to be last in.	Staff capacity is not so bad on some of their members, but it will knock others out who are capable of getting the job done but are more reliant on consultants.	Additional resources are many times needed in a project more than ever, which makes getting it all together a longer process.