

2024-2025 Qualified Allocation Plan (“QAP”) Summary of Changes

The Illinois Housing Development Authority (“Authority”) is the allocating agency for the Low Income Housing Tax Credit (“LIHTC”) program in Illinois. The QAP is the policy and scoring document governing how LIHTCs are awarded across the state for the development of affordable housing. The Authority allocates approximately 27 million in 9% LIHTC annually.

Below, please see a summary list of changes.

- **Trackable Policy Priorities** - a new QAP Policy Priority chart was created to tie the three policy priorities (statewide equity, most vulnerable populations, and sustainability and energy efficiency) to the QAP requirements and incentives to ground the policy priorities into actionable implementation and tangible measurements for the future.
- **Permanent Supportive Housing Track (“PSH”)** - now offering separate scoring criteria for PSH development projects that commit at least 30% of the development’s units to the state’s most vulnerable populations, increase integrated supportive housing models and scale unit production. This PSH Track aligns with the Governor’s Home Illinois Plan (plan to end homelessness) and serves the extremely low-income population (30% AMI) across the state.
- **Quality of Life Index (“QOLI”)** - implemented a census tract-based planning tool intended to determine areas of high livability. The QOLI brings awareness to where communities are strong and where they can improve the quality of life for its residents based on five categories, including education, prosperity, health, housing, and connectivity.
- **BIPOC Development Team**- updated scoring to prioritize BIPOC for profit developers and incentivized greater participation of MBE/WBE/DBE entities across all development teams.
- **Third party cost estimate** - now requiring a third-party entity to independently verify construction costs to limit increases after award is made and prior to closing.
- **Developer fee** - the developer fee limit was increased from \$2 million to \$2.5 million when the Sponsor requests soft fund resources.
- **Updated Sustainability Incentives**
 - Enterprise Requirements - baseline mandatory requirements that were formerly required at the PPA stage have now moved to the Application review period.
 - Green Building Certification Path- the current green building certification path was refined and expanded to increase the number of certifying organizations at the basic, advanced and net zero energy levels.
 - Energy Efficiency Path- The newly created energy efficiency path will give developers of affordable housing, not capable of pursuing a green building certification, an opportunity to incorporate energy efficiency into their project, thereby creating an entry level to the incorporation of sustainability into future developments.
 - Inclusion of the Zero Energy Ready Home program – it is administered by the federal government at no charge to the participant, is also a requirement of some of the tax credit programs included in the Inflation Reduction Act. Many of these tax credits are stackable with LIHTC.

In addition to these updates and changes, see Table A for a comparison of the scoring between the 2022-23 QAP and the 2024-25 QAP. Table B includes a chart summarizing the changes in the Mandatory Components section.

Table A - Comparison of Scoring, 2022-23 QAP and 2024-25 QAP

2022-2023 QAP	Weight (Only One Track)	2024-2025 QAP	General Track Weight	PSH Track Weight
<i>Project Design and Construction</i>	15%	<i>Project Design and Construction</i>	15%	15%
Accessibility: Universal Design		Accessibility: Universal Design		
Accessibility: Additional Accessible Units		Accessibility: Additional Accessible Units		
Unit Mix		Unit Mix		
Cost Containment		Cost Containment		
<i>Sustainability and Energy Efficiency</i>	13%	<i>Sustainability and Energy Efficiency</i>	13%	7%
Basic Program Certification: Green Building Standards		Green Building Certification: Basic Level		
Advanced Program Certification: Green Building Standards		Green Building Certification: Advanced Level		
Net Zero Program Certification		Green Building Certification: Net Zero Level		
		Energy Efficiency Certification		
<i>Community Characteristics</i>	25%	<i>Community Characteristics</i>	27%	27%
Market Characteristics		Market Characteristics		
Community Targeting		Community Targeting		
Affordability Risk Index		Affordability Risk Index		
Transportation		Transportation		
Neighborhood Assets		Neighborhood Assets		
-		AHPAA		
<i>Development Team Characteristics</i>	15%	<i>Development Team Characteristics</i>	15%	13%
Illinois Based Participants		Illinois Based Participants		
BIPOC Development Control		BIPOC Development Control		
MBE/WBE/DBE		MBE/WBE/DBE		
Non-Profit Participation		Non-Profit Participation		
<i>Financial Characteristics</i>	18%	<i>Financial Characteristics</i>	18%	16%
Rental Assistance		Rental Assistance		
Deeper Income Targeting		Deeper Income Targeting		
LIHTC only (no other Authority Resources)		LIHTC only (no other Authority Resources)		
Leveraging		Leveraging		
<i>Housing Policy and Objectives</i>	14%	<i>Most Vulnerable Populations</i>	12%	22%
SRN		SRN		
Section 811 Participation		Section 811 Participation		
AHPAA		Coordination of Referrals		
-		Coordination of Services		
-		Supportive Housing Experience, Training, Endorsements		
-		50% or More Units Dedicated to Supportive Housing		
Total Points	100	Total Points	100	100

Table B- Mandatory Criteria Overview

2022-2023 QAP Mandatory Categories	2024-2025 QAP Mandatory Proposed Category Changes
Project Narrative	No major changes
Public Outreach/Certificate of Consistency	No major changes
Community Engagement	Removed Community Engagement since it is part of the required EGC process. Instead, included Community Revitalization requirements within the Mandatory section.
Site Control	No major changes
Zoning	No major changes
Site Physical Information	No major changes
Historic Preservation	No major changes
Phase I Environmental	No major changes
Architectural Requirements	The architectural requirements were formerly under the Standards for Architectural Planning and Construction and now they are newly branded as the Authority's Design, Construction and Regulatory Requirements.
Construction Cost Breakdown	An independent third-party construction cost estimate will now be required for every Project.
Projects Involving Rehab and Adaptive Reuse	No major changes
Relocation	No major changes
Market Study	No major changes
Development Team	Added that a participant may not be an appropriate development team member if they have been involved in a project awarded tax credits by the Authority that failed to close or be placed in service within 12 months of the execution of the reservation letter and payment of the reservation fee. Also, added a table to clarify the required experience for each development team member.
Financial Feasibility	No major changes
Enterprise Green Communities (EGC)	Previously, EGC was required of all projects, now minor rehab projects can be exempted.
Special Population Considerations	Section updated to "Policy and Priority Population Considerations"
Permissible Waiver Requests	4% waiver is no longer needed
Application Cert., Org. Chart, and Identity of Interest Cert.	No major changes