

Public Comments and Responses to IHDA's draft of the 2026 Qualified Allocation Plan ("QAP")

As part of the QAP planning and writing process, the Illinois Housing Development Authority held a public hearing and a respective 30-day public comment period in which the affordable housing development community was able to review a draft of the 2026 QAP and comment accordingly. IHDA appreciates and recognizes the importance of this feedback as it has informed the updates and changes to the final [2026 QAP](#).

Below you will find a summary of the comments received with IHDA's response. If you have additional questions, feel free to reach out to multifamilyfin@ihda.org. Thank you to all those that submitted a comment!

Requested Consideration to-

1. *Increase the tax credit limit to 2 million*

The Authority has increased the tax credit maximum to 1.7 million.

2. *Remove the third-party cost estimate requirement*

In efforts to contain the rising costs in development projects, a third-party cost estimate will continue to be required for every project.

3. *Revise the rehabilitation requirements to reflect actual needs of properties*

All rehabilitation projects will need to comply with a physical needs assessment and minimum rehabilitation standards as written in the 2026 QAP.

Supportive Housing Related Comments

1. *Request to reconsider the 400-unit requirement to receive maximum points under the supportive housing experience category.*

The 400-unit requirement remains in the 2026 QAP as a marker to demonstrate extensive experience successfully developing and placing in service a portfolio of supportive housing units.

Sustainability Comments

1. *Eliminate the EGC mandatory requirements for 4% deals*

The 2020 Enterprise Green Communities 40 mandatory project criteria will remain a requirement for 4% deals.

2. *Modify or eliminate the energy efficiency incentives related to various Energy Star programs because they may not exist in the near future.*

As of the 2026 QAP publication, the Energy Star programs are still in effect. The energy efficiency incentives will remain unchanged.

General Comments

1. *Incentivize permanently affordable projects*

Long-term affordability is critical for projects; currently, the 2026 QAP does not offer additional points for these types of projects.

2. *Implement a preservation set-aside or scoring incentive*

While preservation efforts are important to affordable housing development, they are currently not being incentivized in the 2026 QAP.

3. ***Implement a set-aside or scoring incentive to incentivize development in high-cost communities known as Affordable Housing Planning and Appeals Act (AHPAA) “non-exempt local governments” (NELGs).***

A set-aside or scoring incentive for NELGs is not currently included in the 2026 QAP.

4. ***Allow Quality of Life Index (“QOLI”) and Affordability Risk Index (“ARI”) proximate scoring***

IHDA does not have plans to allow for proximate scoring for either market tool.