Public Comments to IHDA's Draft 2027-2028 Qualified Allocation Plan

May 15, 2026 - June 15, 2026

Public comments to IHDA's draft 2027-2028 Qualified Allocation Plan that were received during the designated public comment period are listed below. Many comments were received in letter form; in these circumstances, all unique recommendations and/or comments have been distinguished as separate submissions in the table below.
When necessary, public comments have been summarized for brevity.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
5/19/2026	Abbey Benesh	Green Building Initiative	We respectfully request that GBI's flagship rating system, Green Globes, be explicitly included alongside the menu of other certifications given the distinct value it offers to project teams...Including Green Globes as an approved certification option would expand flexibility, reduce barriers to participation, and support a broader range of projects in achieving verified, high-performance outcomes.	At this time, IHDA is unable to include the Green Globes as a certification pathway congruent with the current options offered.
5/26/2026	John Bannon	Western Illinois University	Most communities would benefit more from 6 cottage court arrangements of 8 units than from one 48 unit area. Or 12 fourplexes. Or 8 six flats. Scattered site / geographic distribution would be best for communities because the LIHTC developments would be naturally incorporated into neighborhoods versus becoming their own neighborhood. This also avoids creating large areas of low-income housing and leads to more mixed income housing, much better for LIHTC residents and their communities. I would make an exception for senior housing, which does make sense to cluster.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as this type of scattered site arrangement would likely increase development costs which runs in contradiction to one of the QAP's stated policy priorities. However, IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
5/27/2026	Stephen Porras	Hispanic Housing Development Corporation	SRN units require rental subsidy. In the City, that means PBV's for at minimum 10% of units. The City requires at lease 5% of units to be set aside for Continuum of Care referrals. Same very low income profile as SRNs --30% AMI — and also need PBV's. The CHA has announced that it's going to limit the number of PBV's that get used for SRN units. Possibly CoC units as well. That will leave an NOI gap that needs to be filled. Can IHDA, the City, and CHA get on the same page when it comes to these 30%AMI mandates and commit to fund rental subsidy for them?	IHDA appreciates this feedback though will not be implementing any associated changes to its 2027-2028 QAP. IHDA will continue to work collaboratively with CHA and DOH to address opportunities to improve coordination and provide greater clarity for owners and property managers when there are overlapping requirements.
6/2/2026	Steve Thomas	5T Management Inc	The property management fee should be raised to 7%. The property manager is one of the most vital aspects of a LIHTC deal. This entity manages the deal for a 15-30-year period and is crucial to maintaining the project's compliance.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in other or future policy documents.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/4/2026	Aliya Bagewadi	BVRE	**Broaden "Innovative Models" to Include Energy Equity (Section IX.D.d)** IHDA's new Creative Solutions Policy Track seeks innovative models the Authority "typically does not see". While current criteria focus on construction speed, resident-centric shared solar is an "innovation of affordability." • Recommendation: Explicitly recognize frameworks that utilize on-site shared energy to significantly lower resident utility burdens as a qualifying "Innovative Model." This provides a scalable, repeatable solution to bridge the solar divide for Illinois renters.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as incentivizing the incorporation of on-site physical energy delivery systems doesn't align with the intent of the "Creative Solutions" policy track.
6/4/2026	Aliya Bagewadi	BVRE	**De-couple Physical Consumption from "Paper Offsets" (Section IX.C.vi.a)** The current Net Zero Pathway (9 points) treats all energy offsets equally—whether they are "paper" offsets like Renewable Energy Certificates (RECs) or on-site physical delivery systems. This creates a competitive disadvantage for on-site sharing technology, which has higher upfront costs than paper subscriptions but provides significantly higher resident benefit. •Recommendation: Reserve the full 9-10 points for projects facilitating direct on-site consumption for residents. Projects meeting requirements solely through off-site RECs or community solar should be capped at a lower value to reflect the lower impact on resident utility bills.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. Due to the wide range of project types funded through the LIHTC program, many of which don't have sufficient space for on-site physical energy delivery systems, IHDA is unable to make on-site physical energy delivery systems a requirement for receiving the allocated points.
6/4/2026	Aliya Bagewadi	BVRE	**Recognize Solar as a "Capital Stack Tool" (Section IX.C.ii.a)** Directly shared on-site solar is a capital structure decision, not just an amenity. It acts as a "basis multiplier," increasing the total eligible basis and generating more LIHTC and ITC equity. By leveraging these non-Authority resources (including Illinois Solar for All), developers can fill "avoidable funding gaps" without requesting additional limited IHDA soft funds, directly supporting the Authority's Cost Containment pillar.	There are currently no restrictions within the 2027-2028 QAP that would prohibit the inclusion of non-IHDA resources, such as Illinois Solar for All, as a part of the capital stack for the project.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/4/2026	Aliya Bagewadi	BVRE	**Verified Data for Long-Term Compliance** The Draft QAP requires Net Zero performance to be "trued up annually with actual data for five years." Direct-sharing technologies provide the granular, unit-level monitoring software necessary to ensure projects actually maintain the high-performance standards they committed to at application, reducing administrative risk for IHDA. The Impact: Benefits for Residents and Developments. Incentivizing direct on-site shared solar ensures that "affordability" includes the total cost of housing, including utilities. • For Residents: It provides immediate, long-term savings—often reducing monthly bills from $300 to $75—allowing 30% AMI renters to participate in the energy transition with no upfront costs. • For Developments: It improves Net Operating Income (NOI) through potential solar amenity fees while still lowering the tenant's total cost of living. It also improves ESG scores and provides a separate layer of equity that makes developments more financially resilient.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. Due to the wide range of project types funded through the LIHTC program, many of which don't have sufficient space for on-site physical energy delivery systems, IHDA is unable to make on-site physical energy delivery systems a requirement for receiving the allocated points.
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**Building Development 7xperience - page 42.** This point category should be removed. Tax credit development and ownership is highly complex. The primary concern of all involved in the production of affordable housing should be quality housing and long-term viability. Novice developers create risk for IHDA and residents.	The "Building Development Experience" category incentivizes limited experience co-sponsors, rather than primary sponsors, on an application's development team. All development teams will be subject to the QAP's mandatory experience requirements. Additionally, this category advances "Statewide Equity," one of three stated policy priorities.
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**Cost Containment - page 44-45.** While we understand the need to conserve the scarce 9% LIHTC resource, increasing this point category from 3 to 6 points will stress financial feasibility during a challenging economic climate. Equity pricing is at the weakest it has been in the past decade, while interest rates and construction costs remain high. Incentivizing deals to have costs significantly below the limits increases the chance that these deals will develop financial gaps due to cost overruns. The time spent looking for sources to fill these gaps ultimately leads to slower production of much-needed affordable housing units. We suggest this category be restored to a 3-point maximum.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as "Cost Containment" encompasses one of three stated policy priorities.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**Deeper Income Targeting with Rental Assistance or Income Averaging-page 45.** As project-based rental assistance becomes increasingly difficult to obtain, we applaud IHDA offering income averaging as an alternative. Selecting that minimum set-aside allows for mixed income cortnnunities to be developed without necessitating project-based rental assistance.	IHDA appreciates this feedback.
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**Development Experience Certs at PPA and Full Application** We ask that you consider simplifying this requirement. We are required to list and provide detailed information for every project ever owned in any state where we do business. We must then send a verification form to each SHA for signature. IHDA requires the same process at PPA and then again at Full Application. An abbreviated confirmation from other states at either PPA or Full Application would streamline the process and still provide IHDA with required information--confirmation that the applicant is in good standing in other states.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**Fees** IHDA should consider an electronic fee payment system. Cutting a check, sending it regular mail, and then providing a PDF copy of the check in the application is cumbersome.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**Full Application Process** We believe that IHDA's web-based system, "IHDA Connect" used to submit applications and associated documents is user friendly. However, the IHDA Connect system does not accurately reflect the order of the documents listed in the mandatory checklist. We suggest that IHDA align IHDA Connect with the mandatory checklist.	The IHDA Connect application is currently alphabetized by section, as not all checklist items are responsive with a document submission. IHDA will be building new workspaces within IHDA Connect for the upcoming LIHTC rounds and will make every effort to keep this comment in mind when designing the layout.
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**Illinois Based Participants - page 42.** IHDA should remove this point category. IHDA awarding points in this category violates the Interstate Commerce Clause of the United States Constitution (Article 1, Section 8). Federal District Courts have struck down similar provisions in other states. The QAP should be focused on producing the highest quality of affordable housing that is developed and managed by responsible owners whose primary concern is establishing and maintaining a high quality of life for residents.	IHDA appreciates this feedback and will be adjusting the "Illinois Based Participants" scoring category accordingly in the final 2027-2028 QAP.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**Market Characteristics Point Category - page 48.** IHDA's 2027-2028 QAP 1st Draft does not change this scoring category and keeps the description and supporting documentation exactly as it was in the previous QAP. While IHDA indicates the factors assessed in determining a market score for a given site (i.e penetration rate, capture rate, unit type and income targeting of Project as percentage of affordable housing in the PMA) and provides some guidance in the Standards for Site and Market Study Reviews & Professionals document, we believe that some of these categories are vague, do not have substantive support, and do not always accurately capture market suitability. An example is Targeted Income Levels, where in order to receive an "exceeds expectation" score, the "proposed targeted income levels is/are not well represented by the affordable rent-restricted units in the PMA." This description does not indicate guidance on income targeting relative to other affordable properties in the PMA. Nor does it factor in the age of these assets, as there could be a sufficient amount of 60% units in a given PMA, but those units may be old and obsolete, thereby distorting the true status of housing stock in a given PMA. Additionally, with the equity market weak, interest rates and construction prices high, having these very low AMI averages becomes increasingly infeasible. Another example is Targeted Population, where in order to achieve an "exceeds expectation" score, the proposed targeted population must currently be targeted in between 0% and 15% of the affordable units in the PMA. We have failed at the PPA round on several occasions in trying to develop 56 units of senior housing in the city of Champaign. We have provided evidence by form of a market study indicating significant expected growth for Champaign's senior population from 2022 to 2027. The city of Champaign currently has 328 senior units with 60 additional units under construction. These	Age of housing stock and targeted population are currently considerations in the PPA Market criteria and influence recommendations. It is IHDA's expectation that market studies for projects located in appropriate markets will score zero points.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**Non-Exempt Local Government (NELG) Point Category - page 58.** In the 2027-2028 draft of the Illinois QAP, IHDA has increased this point category from 2 points to 5 points. We request that IHDA reduce this point category down to 2 points or remove it altogether. This point category incentivizes development in areas where less than 10% of the housing stock is deemed affordable. The age of the housing stock in a given market is not taken into account rendering the analysis incomplete. A market like Sandwich, Illinois is indicated as having an affordable market share of over 74% but has only had 30 affordable units constructed since 2017. Carpentersville, Illinois has an affordable market share of nearly 70% but has only had one LIHTC award, a rehabilitation back in 2008. Clearly, these are both markets that needs more affordable housing, but would not score competitively with the weight of the NELG category as it is currently proposed.	The "Communities Lacking Affordability" category provides incentives for developments located either partially or fully within municipalities with an affordable housing share up to 20%; a significant expansion beyond prior QAPs' standard of 10%. Additionally, this category advances "Statewide Equity," one of three stated policy priorities.
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**PPA Enterprise Green - page 17.** IHDA should clarify that a developer must adhere to EGC or a non-EGC qualifying cert listed in the scoring section. The language is not clear.	IHDA will clarify this language and requirement in the final 2027-2028 QAP.
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**PPA Food Access - page 20.** IHDA verifies full-service groceries via an NAICS definitions/data base. In past rounds, obvious full-service grocery stores have not been listed. We recommend allowing applicants to provide other proof that there is a full-service grocery store available.	IHDA allows for submission of additional documentation that would explain how future tenants could access food (i.e., narrative/maps, community plans that show future food access). If not automatically provided at PPA, these explanations will be requested during the new PPA clarification period.
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**PPA Reviews-page 21.** IHDA should create a clear point system to give an applicant a definable path to achieve success at PPA. In a recent round, 70% of the PPAs in one set-aside were denied. Significant work and resources are required to submit a PPA, and clearer objective guidelines as to what will pass IHDA's threshold review requirements would be appreciated.	The PPA criteria is clarified within the 2027-2028 QAP and accompanying supplemental documentation. IHDA's addition of a PPA clarification period in the 2027-2028 QAP will provide an opportunity for additional feedback and communication between sponsors and IHDA regarding the requirements and assessments of PPA submissions.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/4/2026	Barry Accountius	Woda Cooper Companies, Inc.	**Rent Limits set at 95% of County Limits (Underwriting Standards Guide page 17)** The 2027-2028 Illinois QAP continues to emphasize cost effectiveness and efficiency in development of affordable housing, as evidenced by the cost containment point category in addition to the 1st tiebreaker in the 2026 QAP which is now the 2nd tiebreaker in the 2027-2028 QAP draft being lowest per unit construction costs. This, coupled with SRN unit requirements and the deeper income targeting scoring category makes deals significantly more difficult to make pencil. That being, artificially reducing the rents developers are able to set by 5% of the federal requirements is contrary to the objective of maximizing unit production.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/9/2026	Cat Vielma	Redstone Equity Partners	LIHTC investors have accepted IHDA's State Referral Network ("SRN") as eligibility for SRN begins with state-funded case management. Prior to tenancy in a LIHTC community, the household's services are already coordinated through the State of Illinois and their income is deemed as appropriate for the selected unit. In many cases, the SRN households also benefit from a tenant based voucher or project-based voucher (Section 811) – which is also coordinated alongside the State of Illinois. The SRN model relies upon funded service delivery alongside tenant income verification and, in many cases, rental subsidy.	IHDA will publish clear guidance and requirements surrounding service coordination within the IHDA PSH Requirements Guide, supplemental to the QAP.
6/9/2026	Cat Vielma	Redstone Equity Partners	**Section IX.E) Rental assistance and supportive services should be required components of Permanent Supportive Housing, not point-scoring features** We recommend IHDA consider the following refinements within the PSH policy track: 1. Require that all PSH units at/below 30% AMI include committed project-based rental assistance or equivalent subsidy; 2. Require a defined, funded service delivery framework as a baseline eligibility condition	IHDA appreciates this feedback though will not be implementing the proposed change regarding rental assistance to its 2027-2028 QAP. New requirements have been incorporated into the "Deeper Income Targeting with Rental Assistance or Income Averaging" scoring category requiring that projects include rental assistance on all 30% AMI units (inclusive of applicable PSH units) or utilize the income averaging, or alternately (if pursuing points under the PSH policy track) may earn points by demonstrating valuable, eligible commitments of rental assistance. Projects that do not include rental or operating subsidies for PSH units will be less competitive and will likely not meet the requirements of IHDA's Underwriting Standards Guide. Additionally, IHDA will publish clear guidance and requirements surrounding a project's service plan within the IHDA PSH Requirements Guide, supplemental to the QAP.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/9/2026	Cat Vielma	Redstone Equity Partners	We encourage IHDA dialogue with the City of Chicago Department of Housing on permanent supportive housing. Within its Permanent Supportive Housing track, the City of Chicago's QAP treats both project-based rental assistance ("rent-subsidized") and supportive services ("three tiers of supportive services") as core eligibility criteria for its Permanent Supportive Housing track. It is not an optional scoring element. However, for its 5% "set-aside" of units for referrals from the Chicago Continuum of Care, it does not require rental subsidy or services. Broadly speaking, DOH's multiple tracks for "PSH" units is already confusing, and adding a separate definition and structure via IHDA's QAP – especially without requiring subsidy or service funding – will make the underwriting and operations even more challenging. This is a shared responsibility of both entities but given our prior comments on this topic to DOH, we are making the same comment to IHDA now.	IHDA will publish clear guidance and requirements surrounding service coordination within the IHDA PSH Requirements Guide, supplemental to the QAP. Projects that do not include rental or operating subsidies for PSH units will be less competitive and will likely not meet the requirements of IHDA's Underwriting Standards Guide.
6/9/2026	Julie Nelson	Corporation for Supportive Housing	**Incorporate Trauma Informed Design principles in design requirements.** As part of the Architectural Standards, Universal Design, and Amenities Certification, IHDA could consider incorporating Trauma Informed Design (TIO) elements as additional items for selection. TID principles should be encouraged especially for supportive housing developments. Examples of elements include non-obstructed lines of sight in common areas and hallways, entry/exit/common area doors having windows to improve sightlines, and finish considerations that create welcoming, calming, and non-institutional spaces. The City of Chicago Department of Housing has incorporated Trauma Informed Design principles into their Architectural Technical Standards manual. IHDA could use these principles as a reference.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/9/2026	Julie Nelson	Corporation for Supportive Housing	**Notify Continua of Care of proposed supportive housing projects** IHDA should consider updating the Notification of Elected Officials section to indicate that the local Continuum of Care will be notified of projects applying for the permanent supportive housing policy track. This will allow for increased coordination and community-wide planning for proposed supportive housing projects.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as IHDA provides notification to entities that it is legally required to.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/9/2026	Julie Nelson	Corporation for Supportive Housing	**Require a letter from a service provider for additional SRN units where demand is below a 3:1 ratio.** For developments proposing to include additional SRN units beyond the required percentage where the demand for SRN units is below 3:1, it is recommended that IHDA require a letter from a service provider demonstrating the ability to make referrals to the property. In the current draft of the QAP, proposals can either include a narrative describing the demand for SRN units, or a letter from a service provider. It is recommended that a service provider letter is required to demonstrate a coordinated effort to provide appropriate referrals for SRN units.	This change will be implemented within the final 2027-2028 QAP.
6/9/2026	Julie Nelson	Corporation for Supportive Housing	**Require low-barrier tenant screening practices in PSH track projects.** CSH applauds the work of IHDA to implement tenant screening standards for permanent supportive housing projects. Because low-barrier tenant screening is a definitional component of supportive housing, CSH recommends removing this component from scoring criteria and instead require that all projects pursuing the permanent supportive housing policy track follow IHDA's PSH tenant screening requirements guide. CSH recommends IHDA also add a scoring incentive for affordable housing developments that implement these low-barrier screening practices.	IHDA appreciates this feedback though will not be implementing changes to the associated mandatory requirements and point incentives under its 2027-2028 QAP. Language will be added, however, to clarify that IHDA expects all applications seeking points under the PSH policy track to align with low-barrier tenant screening practices.
6/9/2026	Julie Nelson	Corporation for Supportive Housing	**Revisit the geographic set aside allocations.** To fully meet IHDA's policy priorities, including consideration of Williams, Colbert, and Ligas Class Members, IHDA should revise geographic set asides to ensure allocations align with the housing preferences of prioritized populations. In particular, the reduction in allocation for the City of Chicago from 12% to 10% should be revisited, given that Williams and Colbert Class Members overwhelmingly prefer to live in Chicago. While it is acknowledged that other affordable housing development resources are available in Chicago, these resources do not place the same priority on Williams, Colbert, and Ligas Class Members. As indicated in the PAIR module: • 79% of Williams Class Members want to live in Chicago • 21% of Ligas Class Members want to live in Chicago • 72% of Colbert Class Members want to live in Chicago	The 2027-2028 QAP's 9% allocation goals were revised to more equitably reflect household distribution by geographic set-aside; this change advances "Statewide Equity," one of three stated policy priorities.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/9/2026	Julie Nelson	Corporation for Supportive Housing	**Revisit the percentage of units dedicated to the Statewide Referral Network In order to better meet IHDA's policy goals, it is recommended that IHDA update SRN requirements to increase the number of units prioritized for Class Members:** • Increase the required SRN percentage for developments in the Chicago set-aside to 12%. 8,680 SRN applicants desire to live in Chicago, representing 60% of all SRN applicants. • Raise the SRN requirement from 5% to 10% in non-metro areas when either HMIS data or SRN data reflect a need of 5 people who qualify for each new SRN unit.	IHDA will not be implementing the proposed changes to its 2027-2028 QAP.
6/9/2026	Julie Nelson	Corporation for Supportive Housing	**Use a scoring incentive to promote the inclusion of social services groups and people with lived experience in project design.** For a building to meet the needs of future tenants, a range of future tenants and service provider organizations should consult on the design, administration, and other features of the proposed community. CSH recommends adding points for the permanent supportive housing policy track for developments that demonstrate how tenants and service providers have, or will be, involved in decision making.	IHDA will not be implementing the proposed change to its 2027-2028 QAP.
6/12/2026	Allison Clements	IHC	**Clarify Energy Efficiency Points** We appreciate the inclusion of a non-certification pathway for Green Building Design points. However, additional clarification is needed regarding how projects pursuing this pathway will demonstrate compliance with the requirement to perform at least 10% above the applicable energy code. Specifically, it is unclear whether applicants must submit an energy model or other supporting documentation as part of the application, or whether applicants are simply committing to this standard at application and demonstrating compliance later through building modeling and plan review during the final design and construction approval process. We recommend that IHDA clearly outline the timing, documentation, and verification requirements associated with this pathway.	IHDA will clarify this language and compliance requirements in the final 2027-2028 QAP.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/12/2026	Allison Clements	IHC	**Increase the Tax Credit Cap** We appreciate IHDA's recent decision to increase the annual tax credit cap from $1.5 million to $1.7 million. However, construction costs continue to rise, while affordable housing developments are becoming increasingly difficult to finance. As a result, the current cap can constrain project feasibility and limit opportunities to achieve economies of scale. To better align the program with current market realities, we recommend increasing the annual tax credit cap to $2 million. A higher cap would provide greater flexibility in structuring transactions, support the development of larger and more impactful projects, and improve overall cost efficiency by allowing fixed development costs to be spread across a greater number of units. Illinois would remain well within the range of peer states that have adopted tax credit caps above $2 million, including Arizona, New Jersey, Oregon, Washington, and Florida. Increasing Illinois' cap would strengthen the effectiveness of the program and help address the growing gap between development costs and available resources.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in future policy documents.
6/12/2026	Allison Clements	IHC	**Narrow Project Modification Parameters** Page 62 of the draft QAP lists specific project modifications that may subject the project to revocation of the conditional allocation or penalization of future applications from the project participants. The bullet "any changes in the project's financing" is too broad, particularly regarding financing terms and equity pricing. If IHDA considers equity changes as a reason to revoke a conditional allocation or penalize future applications, we ask that there be more specificity concerning the variance and consider the impact of equity timing and factors outside the developer's control.	IHDA appreciates this feedback though will not be implementing any associated changes to its 2027-2028 QAP.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/12/2026	Allison Clements	IHC	**Permanent Supportive Housing Service Providers** We recommend that IHDA set a higher standard for how service providers are selected and supported. SRN and PSH households deserve a coordinated network behind them rather than an assigned provider with no accountability structure. Investors will also be significantly less likely to invest in PSH that does not have services included, whether through a well-capitalized experience provider via an MOU, or as an ongoing operating expense.	IHDA will publish clear guidance and requirements surrounding a project's service plan within the IHDA PSH Requirements Guide, supplemental to the QAP. Additionally, service providers are required to submit a experience certification form for review at PPA and full application, and incentives are provided for demonstrating experience with service funding sources and clear social service budgeting for the project under the "Coordination of Services" scoring category.
6/12/2026	Allison Clements	IHC	Reduce Rehabilitation Requirements and Increase Flexibility for Preservation Projects • **Property Needs Assessments and Rehabilitation Scope** Not all properties require substantial rehabilitation. When a Property Needs Assessment supports a more limited scope of work, that scope should be permissible. Current requirements can result in over-scoping projects by requiring replacement of building components that remain functional and may otherwise be replaced through routine operations and maintenance. For example, mandatory replacement of cabinets, flooring, and similar items can increase costs without materially improving long-term property performance. While waivers may be available, they are granted at IHDA's discretion. Codifying greater flexibility within the QAP would provide clarity to applicants and encourage more appropriately scoped, cost-effective rehabilitation proposals. This could be accomplished by establishing a minimum construction cost per unit or by requiring inclusion of only those repairs and replacements anticipated to be necessary within a defined future period, such as five years.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as the minimum rehabilitation requirements, which are applied in a flexible manner, will ensure that the building is sufficiently rehabilitated and can be adequately maintained. IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/12/2026	Allison Clements	IHC	Reduce Rehabilitation Requirements and Increase Flexibility for Preservation Projects • **Universal Design Requirements** While the requirement to incorporate fifteen Universal Design elements may be appropriate for new construction projects, applying the same standard to rehabilitation developments can be costly and, in some cases, infeasible due to existing building configurations. If preservation remains a priority, IHDA should consider reducing the number of required Universal Design elements for rehabilitation projects while continuing to advance accessibility objectives.	IHDA will not be implementing the proposed change to its 2027-2028 QAP.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/12/2026	Allison Clements	IHC	Reduce Rehabilitation Requirements and Increase Flexibility for Preservation Projects **Additional Threshold Requirements That Increase Rehabilitation Costs** IHC also recommends reviewing several threshold requirements that can add significant cost to rehabilitation transactions, including: o Accessibility requirements that exceed applicable code requirements; o Blower door testing requirements; o Bulk storage requirements; and o Veterans' housing preference requirements.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as the identified additional requirements are critical to creating affordable housing that adequately supports the residents and assists the owner in adequately maintaining the property.
6/12/2026	Allison Clements	IHC	**Reduce Third-Party Cost Estimate Requirements** The requirement for third-party cost estimates should be limited - for example, to first-time applicants or projects pursuing cost containment points through the Creative Solutions track.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as the third-party cost estimate is a valuable tool for evaluating a development's financial viability. However, IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/12/2026	Allison Clements	IHC	**Rental Assistance** Our investor members are concerned that the proposed QAP awards points for project-based rental assistance rather than requiring it for PSH developments serving households at or below 30% AMI. Rental assistance is a well-established national best practice for these populations and is critical to both resident affordability and project feasibility. Developing and operating PSH units at these income levels without rental assistance can create underwriting challenges, reduce investor interest, and leave residents rent-burdened despite living in a LIHTC property. We therefore recommend requiring an appropriate form of rental assistance for PSH developments serving households at or below 30% AMI rather than treating it as an optional scoring item.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. New requirements have been incorporated into the "Deeper Income Targeting with Rental Assistance or Income Averaging" scoring category requiring that projects include rental assistance on all 30% AMI units (inclusive of applicable PSH units) or utilize the income averaging, or alternately (if pursuing points under the PSH policy track) may earn points by demonstrating valuable, eligible commitments of rental assistance. Projects that do not include rental or operating subsidies for PSH units will be less competitive and will likely not meet the requirements of IHDA's Underwriting Standards Guide.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/12/2026	Allison Clements	IHC	**Transit Oriented Development** The proposed TOD scoring criteria exclude projects located in transit-rich areas that qualify under the Illinois People Over Parking Act but are not located within an RTA TOD planning area or a municipality that has adopted a formal TOD plan. To better align the QAP with recent state policy and encourage housing production near transit, IHDA should consider allowing projects located within the distances specified under the People Over Parking Act to qualify for TOD points regardless of whether a formal TOD planning process has been completed.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as applications that locate near transit may earn points under the "Access to Transportation" category regardless of the presence of a TOD planning process. IHDA will update the distance thresholds under the "Access to Transportation" category to align with those established in the "People Over Parking Act."
6/12/2026	Allison Clements	IHC	We are particularly encouraged by the inclusion of several recommendations that IHC and its members have made over the past several years. These include the revisions to Green Building Design scoring, the additional points available for preservation applications, and the reduction in the number of units required to be placed in service to qualify for Supportive Housing experience points.	IHDA appreciates this feedback.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Bill Eager	POAH	**Balance Across New Policy Scoring Tracks** POAH appreciates IHDA's effort to sharpen policy priorities through the proposed Policy Tracks. However, POAH is concerned that the Permanent Supportive Housing (PSH) track is structured in such a way that PSH projects will capture most or all of the available points within that track, while the other two tracks are structured so that any given general occupancy production or preservation project will qualify for a smaller share of available points. For example - any given Targeted Markets project is likely to qualify for 5 points under only one of the three 5-point locational items (Affordability Risk, Communities Lacking Affordability, and Community Revitalization Strategies), and the OZ and TOD geographies (3 points total) are relatively narrow – so even very compelling projects will score 10 points or less. Under "Creative Solutions," the 6-point "Innovative Models" item means that even highly at-risk, subsidy-efficient preservation projects will only score highly if they include scope elements that qualify as innovative. PSH projects are also advantaged in the General Scoring, receiving 5 automatic points in the SRN item where other projects must compete (or may not even access points if SRN demand is low). We appreciate that IHDA has reserved the discretion to fund lower-scoring projects, but we encourage IHDA to more clearly define target pools or set-asides for PSH and general occupancy projects that reflect the state's relative need for each project type.	The QAP utilizes only geographic set-asides, not policy-based set-asides, to establish the 9% LIHTC allocation goals. IHDA will award 9% tax credits accordingly. Categories under the three policy track options are established to best advance the stated policy priorities of the QAP. None of the categories included under either the "Creative Solutions" or "Targeted Markets" policy tracks are mutually exclusive from one another by definition or requirements. To accommodate a potential difference in average scores achieved across the available scoring routes, the QAP allows for tax credit allocations to be made to the most competitive developments [within a set-aside] across the general scoring criteria and/or policy scoring tracks.
6/15/2026	Bill Eager	POAH	**Cost Containment** POAH understands and supports IHDA's efforts to contain the cost of LIHTC projects to ensure as many homes can be built as possible with the state's funding programs. However, we are concerned that the Draft QAP's "Cost Containment" scoring item will undermine the competitiveness of worthy projects that have higher per-unit hard costs due to site-specific extraordinary costs and which may have secured additional non-IHDA resources to offset these costs. Accordingly, we encourage IHDA to update the Cost Containment scoring metric to evaluate hard costs net of certain specified extraordinary costs, including demolition, abatement, and the costs of commercial or community space	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as "Cost Containment" encompasses one of three stated policy priorities.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Bill Eager	POAH	**Rental Assistance and Income Targeting** In this context, POAH strongly opposes the Draft QAP's elimination of the Rental Assistance scoring category (previously 8 points). As IHDA is aware, project-based rental assistance is the most effective approach to providing stable, affordable housing for ELI households – providing income-based affordability for households wherever they fall in the range from zero-income to 30% AMI (or above). This is the income group for which the housing gap is most urgent in Illinois -- the state has just 35 affordable and available units per 100 ELI households, and 74% of ELI households are severely cost-burdened (compared to just 7% of households in the 51-80% AMI income range).3	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. New requirements have been incorporated into the "Deeper Income Targeting with Rental Assistance or Income Averaging" scoring category requiring that projects include rental assistance on all 30% AMI units or utilize the income averaging.
6/15/2026	Bill Eager	POAH	**Scoring Predictability for Production Projects** We therefore urge IHDA to prioritize predictability as it considers incremental changes in the scoring rubric within any given project type (production, preservation, PSH). In addition, where specific scoring items rely on geographically-based data that may change over time, we would urge IHDA to allow sponsors to submit the best-scoring output from a rolling time-window (say, the three years prior to application date) to provide predictability for worthy projects that experience swings in local data outside their control.	Scoring criteria under the QAP are guided by its established policy priorities, and therefore are subject to change between QAPs. Despite employing a new scoring structure, the 2027-2028 QAP's scoring criteria are predominantly existing criteria from prior QAPs. IHDA will investigate the recommendation regarding rolling time-windows further, specifically as it may relate to its market tools, for appropriateness in other or future policy documents.
6/15/2026	Bill Eager	POAH	**Three-Bedroom Unit Scoring** POAH supports IHDA's allocation of scoring points for larger units suitable for families. However, the Draft QAP's scoring thresholds for three-bedroom units (unchanged in the Draft QAP) are set so far above a "normal" allocation of larger units that almost no project will be able to "stretch" to attain them. POAH would encourage IHDA to define somewhat lower scoring thresholds – perhaps 1 point for 15% and 2 points for 25% - that would be more likely to induce sponsors to increase their three-bedroom unit allocations.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/15/2026	Charlotte Lefkovitz	Lincoln Avenue Communities	**Building Development Experience Category (QAP pg. 42)** The Authority should remove the Building Development Experience category. While the category's stated purpose — building the capacity of less-experienced entities — is a worthy and codified statewide-equity goal, the mechanism as written cannot achieve it and, in operation, works against the very developers it names.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP as the category supports "Statewide Equity," one of three stated policy priorities.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Charlotte Lefkovitz	Lincoln Avenue Communities	**Construction Cost Breakdown (QAP pg. 31 + DCRC Requirements pg. 10-11)** We have concerns regarding IHDA’s proposal to require Third-Party Cost Estimates. Cost Estimators add to initial project and application costs. We recommend that this third-party cost estimate requirement be removed. IHDA should allow teams to continue to use the selected General Contractor to develop the estimate of probable cost.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as the third-party cost estimate is a valuable tool for evaluating a development's financial viability. However, IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/15/2026	Charlotte Lefkovitz	Lincoln Avenue Communities	**Cost Containment (QAP pg. 44 45)** The Authority should reduce the points available under, and redesign, the Cost Containment category. The Authority’s commitment to cost discipline is appropriate and shared by the development community. The concern is not with the goal but with this particular mechanism, which doubles the available points from three (2026 QAP) to six while retaining a lowest-cost-wins structure that, in a competitive set-aside round, drives downward pressure on building quality and conflicts with the Authority’s own mandatory requirements.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as "Cost Containment" encompasses one of three stated policy priorities.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Charlotte Lefkovitz	Lincoln Avenue Communities	**Developer Fee (Underwriting Guide, pg. 15-16)** We urge IHDA to revisit its developer fee policy for projects financed with 4% LIHTCs and tax-exempt bonds. 1.We recommend IHDA adopt a flat 18-20% developer fee on eligible basis (excluding reserves and developer fees) for projects financed with 4% LIHTCs and TEBs. 2.Even if IHDA does not adopt our previous recommendation, we believe the base fee scaling in the 2024 Underwriting Guide is problematic. Limiting base developer fee to 5% of a project's acquisition basis (with a ceiling on $20 million of total acquisition costs) greatly reduces the potential federal subsidy available to preservation projects utilizing tax exempt bonds and 4% LIHTCs. 3.We appreciate that IHDA will permit increases in developer fee above the base amount on a waiver basis but suggest that a conforming amendment to the underwriting guide to allow the developer fee to increase above 15% (on a waiver basis) would be valuable even if IHDA does not change the base-developer fee methodology as we suggest.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/15/2026	Charlotte Lefkovitz	Lincoln Avenue Communities	**Maximum Tax Credit (QAP pg. 13)** We appreciate that IHDA has maintained the 9% LIHTC per project cap at $1,700,000, increased from $1,500,000 under the prior QAP. Given the escalating construction cost environment and continued uncertainty around tariffs, we think this is a prudent level to preserve. We urge IHDA to consider raising the per project cap further to $2,000,000 to offer greater flexibility to developers and ensure that more Illinois residents have access to quality, affordable housing. A larger cap will allow developers to develop larger projects and take advantage of additional economies of scale in both construction and operations.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in future policy documents.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Charlotte Lefkovitz	Lincoln Avenue Communities	**Policy Track Scoring (QAP pg. 52-61)** The Authority should rebalance the three policy tracks so that high-quality, non-PSH new construction has a path to the full 20 policy-track points comparable to that available to preservation and supportive-housing projects. 1. Configure the Targeted Markets track so that a project can reach the full 20 points through either Communities Lacking Affordability or Community Revitalization Strategies, rather than requiring both. Because a single site can rarely qualify for both, the track should be weighted so that each of these anchor categories, combined with the track's other available items, provides an independent path to 20. This would give a well-sited non-PSH new-construction project a genuine path to a full policy-track score.	Categories under the three policy track options are established to best advance the stated policy priorities of the QAP. Points under the "Communities Lacking Affordability" and "Community Revitalization Strategies" categories are not mutually exclusive; there are no restrictions prohibiting a development from achieving full points under both categories. While the "Communities Lacking Affordability" category is geographically-bound, the "Community Revitalization Strategies" category awards points to applications that demonstrate meaningful planning and engagement efforts with the community. To accommodate a potential difference in average scores achieved across the available scoring routes, the QAP allows for tax credit allocations to be made to the most competitive developments [within a set-aside] across the general scoring criteria and/or policy scoring tracks.
6/15/2026	Charlotte Lefkovitz	Lincoln Avenue Communities	**Policy Track Scoring (QAP pg. 52-61)** The Authority should rebalance the three policy tracks so that high-quality, non-PSH new construction has a path to the full 20 policy-track points comparable to that available to preservation and supportive-housing projects. 2. Recognize that the 9% round is the State's primary new-production tool and weight the policy tracks toward what that round uniquely must accomplish — new production and deeper income targeting — rather than duplicating preservation incentives already delivered through the 4%/bond structure and PSH incentives already housed in the PSH Development Program.	Categories under the three policy track options are established to best advance the stated policy priorities of the QAP. None of the categories included under either the "Creative Solutions" or "Targeted Markets" policy tracks are mutually exclusive from one another by definition or requirements. To accommodate a potential difference in average scores achieved across the available scoring routes, the QAP allows for tax credit allocations to be made to the most competitive developments [within a set-aside] across the general scoring criteria and/or policy scoring tracks.
6/15/2026	Charlotte Lefkovitz	Lincoln Avenue Communities	Remove the Opportunity Zones category (Section IX.F.e). The Opportunity Zone 2.0 designations on which it relies will not be available until January 2027, leaving applicants in the interim unable to determine eligibility, and the item awards points for a federal tax-incentive designation that does not itself advance the Authority's housing objectives.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP as the category supports "Cost Containment and Creative Solutions to Affordable Housing Development," one of three stated policy priorities, and promotes capital resource alignment.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Charlotte Lefkovitz	Lincoln Avenue Communities	**Universal Design (QAP pg. 30; Architectural Standards, Universal Design, and Amenities Certification)** We have concerns regarding the draft QAP's requirement that each Project incorporate twenty (20) additional Universal Design items, not required by code, in 100% of its units. We recommend IHDA retain ten (10) non-code Universal Design items as the mandatory floor applied to 100% of units, and restore the additional ten items as a voluntary, point-earning scoring tier rather than a mandate. In the alternative, IHDA could allow the additional items to be satisfied across a defined share of units (e.g., 50%) and provide an explicit waiver or feasibility pathway for rehabilitation and adaptive reuse projects where specific items cannot be achieved.	IHDA will update the "Universal Design" mandatory requirement to 15 additional elements in the final 2027-2028 QAP.
6/15/2026	Chris Paul	Diamond and Associates	**BIPOC Development Control:** We support the encouragement of participation by BIPOC-led entities with the points allocated.	IHDA appreciates this feedback.
6/15/2026	Chris Paul	Diamond and Associates	**Construction Cost Breakdown:** Please eliminate the third-party cost estimate. We do not see the value of obtaining this report from the schematic designs that are available at this time of application. This is a costly requirement that does not further move the project along.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as the third-party cost estimate is a valuable tool for evaluating a development's financial viability. However, IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/15/2026	Chris Paul	Diamond and Associates	**Enterprise Green Communities:** Please consider eliminating the mandatory requirement that 4% deals meet the 2020 Enterprise Green Communities 40 mandatory project criteria. This adds cost at a time when we should be working to minimize costs. We support the decision to no longer require certification of EGC.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as the Enterprise Green Communities mandatory criteria serves as IHDA's baseline sustainability requirements.
6/15/2026	Chris Paul	Diamond and Associates	**Experience:** Please consider allowing sponsors who do not meet the experience requirements to apply, provided they have included a development consultant on their development team.	IHDA will not be implementing the proposed change to its 2027-2028 QAP.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Chris Paul	Diamond and Associates	**Leveraging:** We continue to think that there should be additional categories in the Leveraging Scoring. We believe that having points available for those projects leveraging 15 – 20% will incentivize developers to go after other resources.	IHDA will incorporate additional threshold categories under the "Leveraging" scoring category within the final 2027-2028 QAP.
6/15/2026	Chris Paul	Diamond and Associates	**Neighborhood Assets:** The distance for Other Metro amenities should be either 0.75 miles or 1 mile. Other Metro should not have the same standard as Metro Chicago and City of Chicago.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. In an effort to align evaluation methodologies across the "Neighborhood Assets" scoring criteria and the PPA "Food Access" requirements, IHDA has grouped the set-asides in a similar fashion.
6/15/2026	Chris Paul	Diamond and Associates	**Supportive Housing Experience –** We appreciate that IHDA reduced the PSH experience to 300 units from 400 units. We would like to see it further reduced and suggest that IHDA create a lower point threshold (2 points) for developers who have developed 150 units of PSH and maintain the 4 points for developers who have developed 300 units.	IHDA will not be implementing the proposed change to its 2027-2028 QAP.
6/15/2026	Chris Paul	Diamond and Associates	We suggest IHDA clarify when developments should seek PSH funding instead of LIHTC resources for a given project. In the current environment, AHIC has pushed for more stringent underwriting on PSH developments. Has IHDA considered what additional support it could provide to PSH LIHTC projects to help them pass AHIC underwriting guidelines? In addition, has IHDA or NCSHA considered pushing back on AHIC's changes, so that LIHTC can continue to support permanent supportive housing deals?	The universal PPA process allows for IHDA to provide clarity to sponsors at the PPA stage regarding the appropriate application pathway for PSH developments (LIHTC and/or PSH Development Program). Additionally, IHDA acknowledges the recent AHIC guidance, and has made adjustments to the 2027-2028 QAP to accommodate a variety of its recommendations while continuing to provide competitive pathways for PSH applications in the LIHTC program.
6/15/2026	Chris Paul	Diamond and Associates	We support IHDA's changes to the PPA process, with the addition of a clarification period and clarified path for both 4% and 9% projects.	IHDA appreciates this feedback.
6/15/2026	Chris Paul	Diamond and Associates	We would like to see the credit cap raised by at least 15%, in recognition of the fact that costs continue to rise and since this QAP is a two-year QAP.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in future policy documents.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Colby Sledge	Grounded Solutions Network	•In Appendix A: Definitions, on Page. A.iii (p. 70 in the document), "Extended Use Period" is defined as, "the period beginning with the first day of the Compliance Period and ending on the date which is 15 years after the end of the Compliance Period unless otherwise indicated in the Extended Use Agreement or unless terminated in accordance with the Extended Use Agreement." Grounded Solutions asks that the end date of Extended Use Period be later than 15 years after the end of the Complicance Period, so that the full Compliance Period + Extended Use Period is greater than 30 years. A 2023 study by the Poverty and Race Research Action Council (PRRAC) found that more than two dozen states either require or heavily incentivize affordability periods longer than the 30 years typical to LIHTC projects. (We applaud the mandatory Qualified Contract Waiver IHDA requires of all Sponsors.) By requiring greater than 30 years of affordability, IHDA can increase the chances that a property remains affordable for multiple generations, and potentially is stewarded by an organization committed to lasting affordability.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as IHDA's definition of "Extended Use Period" is based off of Section 42, which governs Low-Income Housing Tax Credits.
6/15/2026	Colby Sledge	Grounded Solutions Network	•Under Section IX: Application - Scoring Components, item G. Tiebreaker Criteria (p. 61) indicates that the Fourth Tiebreaker is, "Projects that are intended for eventual tenant ownership and have a robust homeownership plan." Grounded Solutions asks that this ownership aspect of a potential project receive greater consideration: as an earlier tiebreaker; as an aspect that provides additional points with in scoring (before tiebreakers); or by some other means deemed to provide higher priority by IHDA.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/15/2026	Dena Bell	IFF	**Construction Cost Estimate -** The construction cost estimate continues to be a burden for developers. In our experience the fees for this study can range from $3,500-$7,000 at application, making this a burdensome cost for smaller developments to put up as at-risk money. Plus, this study is only useful at the application stage. Once credits are awarded the estimate does not provide any additional information for the development team or IHDA to work with. A suggestion would be for IHDA to invest in consultants or technology to analyze the cost information already in hand from application and closings to shore up the cost standards.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP, as the third-party cost estimate is a valuable tool for evaluating a development's financial viability. However, IHDA will investigate this recommendation further for appropriateness in other or future policy documents.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Dena Bell	IFF	**Priority Populations – Olmstead and Consent Decree Populations** - My team is a significant provider of housing for individuals under Olmstead. All of our projects serve the population with as many units as we can provide subsidy for. However, there are no other financial, rental assistance, or scoring incentives for serving this population. We need to align with general QAP scoring criteria just to advance the units that we can provide. It would be great to see some collaboration with the State of Illinois to provide some type of additional resources to support this essential policy goal.	IHDA appreciates this feedback though will not be implementing any associated changes to its 2027-2028 QAP. IHDA will continue to support partner State agencies to advance Olmstead-related goals, including through pursuing additional resources.
6/15/2026	Dena Bell	IFF	**PSH Policy Track / Deeper Income Targeting / SRN Units –** Allow developers of PSH, SRN and Deeper Income Targeting units to gain points for using income averaging. Many Public Housing Authorities across the state are now competing for LIHTC in the same QAP as developers. We have heard from more than one PHA that the agency will not provide rental assistance to support our PSH units, because those same housing authorities are using their voucher allocations to support the development of their own sponsored projects. This is creating a bottleneck of unmet need for PSH projects, where PSH developers can't get vouchers, and then are unable to compete in the PSH set aside.	Under the 2027-2028 QAP applications that utilize income averaging and that include units restricted to households at or below 30% of the Area Median Income (inclusive of PSH and/or SRN units) may earn points under the "Deeper Income Targeting with Rental Assistance of Income Averaging" category.
6/15/2026	Dena Bell	IFF	**Targeted Markets Set Aside –** The points allocated for ARI and Communities Lacking Affordability skew in favor of high-income communities, while only the OZ points seem to target lower income communities. Neighborhood Assets are also going to easier to achieve in higher income communities.	Categories under the three policy track options are established to best advance the stated policy priorities of the QAP. None of the categories included under the "Targeted Markets" policy track are mutually exclusive from one another by definition or requirements.
6/15/2026	Dena Bell	IFF	**Unit Mix –** The 50% threshold for three-bedroom units is a very high standard to reach. Suggest this be lowered to 30% of units. This threshold puts pressure on projects to develop large units to accommodate families, while there is no similar offset for developing smaller, more efficient units for individuals with disabilities.	IHDA appreciates this feedback though will not be implementing the proposed change to its 2027-2028 QAP. IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/15/2026	Jamie Lyons	Newport Partners LLC	We request that the DENH program be included in the Advanced Pathway of the Green Building Design Section for 8 points as a reliable and flexible strategy to reduce energy use, operational costs, and reduce loads.	IHDA will incorporate the DENH program as an eligible certification pathway at a level that is congruent with similar certification programs in the final 2027-2028 QAP.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Jessie Wang	Enterprise Community Partners	**Commitment to Extended Affordability** Enterprise greatly appreciates IHDA's commitment to extended affordability by requiring a waiver of the right to a qualified contract, as stated in Section VIII.Q. Enterprise respectfully requests that this language remain unchanged in the final QAP.	IHDA appreciates this feedback.
6/15/2026	Jessie Wang	Enterprise Community Partners	**Maintaining Value to IHDA Housing Credit Properties via Green Building Requirements and Incentives** IHDA's continued commitment to green building through a required baseline aligned with the Enterprise Green Communities Criteria—and its update to the 2026 Criteria—provides a strong and appropriate foundation for advancing building performance, resilience, and cost stability in affordable housing across Illinois. We support IHDA in maintaining green building as a core element of the QAP; maintaining mandatory green building requirements continues to deliver meaningful benefits related to energy and water efficiency, site performance, materials choices, and resident health and well-being.	IHDA appreciates this feedback.
6/15/2026	Jessie Wang	Enterprise Community Partners	We also recognize the cost containment pressures facing the affordable housing sector and acknowledge the role of a non-certification compliance pathway in response to current market conditions. At the same time, full certification offers distinct value through a holistic framework that integrates energy, water, site, health, resilience, and durability strategies, along with third-party verification to ensure consistent and measurable outcomes. To better reflect this range of value and commitment, we encourage IHDA to consider a stronger differentiation in incentive points between the non-certification pathway and green building certification pathways, reinforcing the benefits of comprehensive, third-party verified approaches while maintaining flexibility for development teams.	IHDA will reduce the "Green Building Design" category's non-certification pathway in the final 2027-2028 QAP to further differentiate the difference between the non-certification pathways from the certification pathways.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Katie Dorn	Home Innovation Research Labs	**Recognition in Zero Carbon Pathway Section** In April of 2026, the American National Standards Institute (ANSI) approved the ICC 700-2025 National Green Building Standard® (NGBS), the latest version of the industry's leading residential green building rating system. For the NGBS Green +ZERO EMISSIONS Certification, projects must be fully compliant with the +NET ZERO ENERGY Certification and go one step above, by being all-electric and having no fossil fuel emissions. Therefore, we believe the NGBS Green +ZERO EMISSIONS Certification would be an excellent addition to the "Zero Carbon Pathway" for 10 points in the Green Building Certification section of Illinois's 2027-2028 QAP.	At this time, IHDA is unable to include the NGBS Green + Zero as a "Zero Carbon" certification pathway congruent with the current options offered.
6/15/2026	Katie Dorn	Home Innovation Research Labs	**Support for Green Building Criteria** We applaud IHDA for maintaining competitive points for third-party green building certifications. The Sustainability Incentives encourage development that is efficient, comfortable, and supports resident health. Comprehensive green building standards support true housing affordability and ensure that funded buildings are designed to support the comfort and health of residents. In particular, we commend IHDA for recognizing NGBS Green certification based on the ICC-700 National Green Building Standard (NGBS). The NGBS was specifically designed for residential projects and is affordable to implement, making it ideally suited for low-income housing programs. By providing NGBS Green Certification options for the Advanced and Net Zero Pathways, IHDA is empowering applicants to pursue their program of choice. We respectfully request that these options be retained in the final QAP.	IHDA appreciates this feedback.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Marnese Jackson	Midwest Building Decarbonization Coalition	**Establish Clear, Required Standards for Meaningful Community Engagement** The Draft QAP references community revitalization strategies but does not require early, ongoing, or culturally responsive community engagement for all developments. Community voice is essential to ensuring that affordable housing is responsive, equitable, and welcomed. We recommend that IHDA: - Require developers to demonstrate early-stage engagement with residents, community-based organizations, and local stakeholders. - Establish minimum engagement practices, including multilingual outreach, accessible meeting formats, and partnerships with trusted community groups. - Provide scoring incentives for projects that incorporate community-identified priorities into design, amenities, and services. - Require documentation of engagement outcomes as part of the application. Embedding community voice strengthens project viability and ensures developments reflect local needs and aspirations.	IHDA appreciates this feedback, and requires documentation of meaningful community engagement that includes consideration of affordable housing as a mandatory threshold under the "Community Revitalization Strategies" mandatory requirement and scoring incentive. Additional community engagement requirements are included via the "Enterprise Green Communities" mandatory requirement.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Marnese Jackson	Midwest Building Decarbonization Coalition	**Expand and Clarify Siting Incentives to Advance Opportunity, eTOD, and Climate Goals** IHDA's use of the Quality of Life Index and food access criteria is a strong foundation. However, the Draft QAP does not explicitly incentivize siting in high-opportunity areas or near transit in ways that align with equitable transit-oriented development (eTOD) and decarbonization goals. Midwest BDC recommends: - Adding a dedicated scoring category for eTOD, including proximity to frequent transit, walkability, and multimodal access. - Strengthening incentives for siting in high-opportunity areas with strong schools, job access, and low environmental burdens. - Clarifying how siting criteria advance AFFH goals and reduce segregation. - Encouraging developments in areas with existing or planned clean energy and electrification infrastructure. These enhancements would help ensure that LIHTC investments expand access to opportunity while supporting Illinois' climate and mobility goals.	IHDA appreciates this feedback though will not be implementing the proposed changes to its 2027-2028 QAP, as various PPA criteria, mandatory requirements, and scoring criteria under the 2027-2028 QAP collectively provide a framework to support these recommendations, including "Enterprise Green Communities," "Access to Transportation," "Transit Oriented Development," and the "Quality of Life Index." However, IHDA will investigate this recommendation further for appropriateness in other or future policy documents.
6/15/2026	Marnese Jackson	Midwest Building Decarbonization Coalition	**Expand Incentives for Family-Sized Units and On-Site Supportive Services** IHDA's strong commitments to supportive housing are commendable. To further advance equitable outcomes, we recommend: - Adding scoring incentives for family-sized units (2BR+), especially in high-opportunity areas. - Encouraging on-site or co-located services such as childcare, youth programming, mental health supports, and community spaces. - Prioritizing partnerships with culturally specific service providers who understand the needs of local communities. These additions would better meet the needs of families, multigenerational households, and communities disproportionately impacted by housing instability.	IHDA appreciates this feedback though will not be implementing the proposed changes to its 2027-2028 QAP. IHDA will investigate these recommendations further for appropriateness in other or future policy documents.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Marnese Jackson	Midwest Building Decarbonization Coalition	**Strengthen Inclusive Tenant Screening to Advance Housing Access and Equity** The Draft QAP includes important fair housing commitments, but it does not yet establish clear expectations for inclusive tenant selection practices. Without explicit guidance, LIHTC developments may unintentionally perpetuate barriers for households disproportionately impacted by eviction, criminalization, and credit discrimination. Midwest BDC recommends that IHDA: - Prohibit blanket exclusions based on eviction history, credit scores, or criminal records. - Require Tenant Selection Plans to align with HUD's guidance on the use of criminal records and fair chance housing principles. - Encourage individualized assessments and mitigation criteria. - Require public posting of Tenant Selection Plans to ensure transparency and accountability. These changes would help ensure that LIHTC developments expand access to stable, healthy housing for all Illinois residents.	IHDA will publish additional low-barrier tenant screening guidance within the IHDA PSH Requirements Guide, supplemental to the QAP. The guidance will speak specifically to scoring requirements under the "Low-Barrier Tenant Screening" category, and will also provide background on best practices to reduce barriers to housing in the screening process.
6/15/2026	Marnese Jackson	Midwest Building Decarbonization Coalition	**Strengthen Transparency and Accountability in Development Team Diversity** We applaud IHDA for including incentives for BIPOC-led and W/MBE/DBE development teams. To ensure these incentives meaningfully expand community wealth and diversify the development ecosystem, we recommend: - Requiring disclosure of ownership and control structures to ensure that BIPOC Development Control is substantive and not nominal. - Providing additional points for partnerships that include capacity-building commitments for emerging BIPOC developers. - Requiring annual reporting on development team demographics and outcomes. These improvements would help ensure that LIHTC investments support a more inclusive and representative development landscape.	IHDA appreciates this feedback though will not be implementing the proposed changes to its 2027-2028 QAP, as various PPA criteria, mandatory requirements, and scoring criteria under the 2027-2028 QAP collectively provide a framework to support these recommendations, including "Building Development Experience" and "BIPOC Development Control." However, IHDA will investigate this recommendation further for appropriateness in other or future policy documents.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Suni Kartha	Impact for Equity	The draft QAP indicates that all applications, whether applying through the general scoring criteria only or additionally through one of the three optional policy tracks, "will be competitively evaluated against one another within their respective geographic Set-Asides." Does this mean that there are no set-asides for each of the optional policy tracks? Given that proposals pursuing only the general scoring criteria cannot earn more than 80 points whereas proposals choosing one of the optional policy can score up to 100 points, do you expect applications that do not select an optional policy track to be competitive?	The QAP utilizes only geographic set-asides, not policy-based set-asides, to establish the 9% LIHTC allocation goals. IHDA will award 9% tax credits accordingly. While applications are not required to pursue points under one of the three policy tracks to be considered for an allocation of tax credits, awards will be made to the most competitive applications. Therefore, applications choosing to solely adhere to the general scoring criteria will limit their scoring potential by 20 points.
6/15/2026	Suni Kartha	Impact for Equity	We are pleased to see that the draft QAP addresses this concern by adding a Targeted Marketed policy track that awards five points to proposals in NELGs. We also appreciate that, while the largest point allocation is reserved for NELGs, the draft QAP recognizes the need for affordable developments in municipalities that IHDA has previously called "at-risk" communities and still awards some points for proposals in those communities. We believe that AHPAA's passage in 2003 was a clear mandate from legislators to increase affordable housing in the state's least affordable communities and the approach outlined in the draft QAP appropriately adheres to that mandate. We are hopeful this will encourage affordable housing developers to look for more opportunities in NELGs.	IHDA appreciates this feedback.
6/15/2026	Suni Kartha	Impact for Equity	We urge IHDA to begin publishing this data in an accessible manner going forward and for past LIHTC cycles. In sum, we applaud IHDA's revision in the draft QAP that prioritizes development in NELGs in alignment with state policy via AHPAA and encourage IHDA to provide additional transparency in how the policy tracks will be used to determine awards. We further urge IHDA to monitor and publicly report on the impact of the change in the draft QAP.	IHDA appreciates this feedback, though this recommendation applies to processes that are not referenced within the 2027-2028 QAP and do not require a change. IHDA will investigate these recommendations further for appropriateness.

Date	Submitter	Organization	Public Comment *(summarized when necessary)*	IHDA Response
6/15/2026	Suni Kartha	Impact for Equity	Within the Targeted Markets policy track, the draft QAP offers points for categories that are mutually exclusive—namely, the “Communities Lacking Affordability” category and the “Community Revitalization Strategies” and “Opportunity Zones” categories. Applications in NELGs would be awarded the maximum five points for Communities Lacking Affordability; however, such an application would never qualify for the points awarded for Community Revitalization Strategies or for being in a federal Opportunity Zone. The same is true in the inverse scenario. Thus, any application that selects the Targeted Markets policy track will never be eligible for the full 20 additional points. This does not appear to be the case in either the Creative Solutions or the Permanent Supportive Housing policy tracks—where one proposal could theoretically score all 20 points. Similar to the above question, does IHDA expect this to place applications that select the Targeted Markets policy track at a disadvantage relative to applications in the other two policy tracks?	Categories under the three policy track options are established to best advance the stated policy priorities of the QAP. Points under the "Communities Lacking Affordability" and "Community Revitalization Strategies" categories are not mutually exclusive; there are no restrictions prohibiting a development from achieving full points under both categories. While the "Communities Lacking Affordability" category is geographically-bound, the "Community Revitalization Strategies" category awards points to applications that demonstrate meaningful planning and engagement efforts with the community. Though qualifying Opportunity Zones census tracts are not yet available, there is no definitional restriction prohibiting qualifying geographies under the "Opportunity Zones" category from also qualifying for points in either of the two former categories. To accommodate a potential difference in average scores achieved across the available scoring routes, the QAP allows for tax credit allocations to be made to the most competitive developments [within a set-aside] across the general scoring criteria and/or policy scoring tracks.