



Public Comments Received on VHFA Draft Qualified Allocation Plan 2027-2028

Public Comment Period from March 24, 2026 through April 24, 2026





Investing in communities. Building possibilities.

To: VHFA Development Staff
From: Nancy Owens/President
Re: Comments on the QAP draft dated March 24, 2026
Date: 4/23/2026

Preserving Rural Housing Investment in Vermont

Vermont is at a critical moment in shaping how affordable housing resources are deployed. Proposed changes to the QAP (Qualified Allocation Plan) would significantly reshape how federal funds are distributed across the state, creating an imbalance for Vermonters and shifting investment away from rural communities, where affordable housing is in critically short supply.

For nearly 40 years, Vermont has taken a different approach. When VHFA created Evernorth (formerly Housing Vermont), the goal was clear: to ensure the federal Low-Income Housing Tax Credit (LIHTC) could be used **across the entire state**, including rural and weaker-market communities where private developers were unlikely to invest. That foresight has been critical to Vermont's housing landscape.

That strategy has worked.

Since 1988, Evernorth has invested \$587M (\$1.3bil in TDC) to help create 7,645 units across 263 properties statewide. The majority of this investment has occurred outside Chittenden County, in communities such as Richford, Waterbury, St. Johnsbury, Bennington, Rutland, Johnson, Dorset, and Vergennes. Importantly, 62% of the \$587M in private bank capital we raised has been deployed in rural communities.

This work has been possible only through deep partnerships with regional housing organizations, local banks, public funders, and municipalities. In many towns, these developments have been transformational-revitalizing downtowns, restoring key buildings, adding commercial space, and providing essential housing where it otherwise would not exist.

VHFA's goal to double housing production over the next decade is both necessary and widely supported. However, the proposed strategy to reduce costs-by enabling larger projects with smaller units-will have important and likely unintended consequences.

What the proposed QAP changes would do:

- Eliminate per-project LIHTC caps

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- Eliminate targets for family housing and larger units
- Removes cap on developer fees

Together, these changes strongly favor **large-scale developments (100+ units)**, typically located in the state's strongest markets. Larger projects are undeniably more cost-efficient and profitable for developers, but they are also **structurally incompatible with most rural communities**, where a 30-unit building is considered large and where land, infrastructure, and market demand limit scale.

While rural LIHTC projects may have higher per-unit costs, they deliver **outsized economic and community** benefits-benefits that are not captured by cost metrics alone. These investments sustain small towns, support local economies, and ensure housing access for Vermonters statewide.

The Risk

Vermont's outcomes stand in sharp contrast to states like New Hampshire. There, the LIHTC program has largely concentrated investment in its metro counties-strong-market areas with the largest populations. Without VHFA's deliberate rural strategy, Vermont's affordable housing investment would likely follow the same pattern.

The Tradeoff

The tradeoff embedded in the current proposal is clear: greater efficiency at the expense of rural equity. Without careful safeguards, these changes will significantly reduce the production of affordable housing in Vermont's rural communities.

A Balanced Path Forward

Increasing production and preserving rural investment are not competing goals - but they do require balance.

As VHFA finalizes the QAP, we encourage consideration of safeguards that:

- Maintain pathways for smaller-scale rural developments
- Preserve incentives for family housing and diverse unit types
- Ensure LIHTC resources continue to reach all regions of the state

These adjustments would allow Vermont to increase housing production while sustaining the statewide approach that has defined its success.

Doubling Vermont's housing supply should not come at the cost of excluding rural Vermont. Please see our detailed comments in the attached memo.

To: VHFA Development Staff
From: Kathy Beyer/SVP Real Estate Development
Re: Comments on the QAP draft dated March 24, 2026
Date: 4/23/2026

These comments are an addendum to the comments submitted by Evernorth on April 6, 2026:

Evernorth appreciates the opportunity to comment on the draft Qualified Allocation Plan for 2027-2028.

We continue to think that a 60 day period would be more appropriate for the public comment period. This would allow VHFA to issue another draft of the QAP, and allow stakeholders time to comment on that draft in advance of the JCTC meeting. We request this longer comment period due to the major changes proposed to the QAP.

We understand that one of VHFA's goals in this QAP update is to address the rapid increases in construction costs and total development costs that have occurred over the last five years. Based on our internal data, these increases are linked almost entirely to construction costs, which have increased by almost 100% over the last five years.

It appears that one path VHFA has chosen to address costs is to allow for larger projects, by removing the 30% cap on the amount of credits per project. It has been documented that larger projects do result in economies of scale, and as such, have lower costs. Here in lies the policy conundrum in Vermont, where large projects (over 100 units) can only be built in our more urban markets which are primarily found in Chittenden County.

There are many examples of the positive impacts of affordable housing projects built in our downtowns and smaller communities across Vermont. Rather than having no cap per project, we advocate to increase the cap to 40% per project. This approach allows for a balance between the goal of reducing costs while also keeping the door open to building in our smaller communities.

Comments by section:

1. THRESHOLD REQUIREMENTS:

3.02 Development Team Capacity

The requirement that an applicant must have closed on a construction loan on all previously awarded developments may have unintended consequences.

This requirement may also result in a major change in the delivery model used in Vermont, where regional nonprofit developers partner with statewide entities like Evernorth. This is a model that was created by VHFA in response to the goal of assuring that complex LIHTC projects are built in all corners of the state and in our more rural communities. And it is a model that has achieved that goal over nearly a 40 year history as evidenced by LIHTC projects in Swanton, Newport, Vernon, and Dorset.

But this does mean that Evernorth is often a co-developer on more than one 9% project and therefore this threshold requirement may result in discouraging this co-developer model.

3.18 Maximum Developer Fees

The developer fee language needs to address major rehabilitation projects; in the past, these projects have been under the same fee policy as new construction.

EVALUATION CRITERIA:

There are three scoring criteria linked to the 30% units for a total of 25 points. The scoring therefore seems to be too heavily weighted to projects that will be able to have a PBV commitment.

4.01 Site Location

We appreciate the proposed scoring for building in our downtowns, village centers, and designated growth areas. However, given the passage of Act 181 and the pending changes to the designations, this language may need to be amended to better align with Act 181.

4.02 Project Tenancy

Reinforcing our prior comments, the requirement to include 30% units in the recorded restrictions in perpetuity is a requirement that should not be advanced by the Agency. Such a requirement could put the long-term financial viability of a project at risk.

VERMONT HOUSING TAX CREDITS

Eligible project: The state rental credits are a much smaller portion of the capital stack. Asking an applicant for the state rental credits to meet all of the threshold requirements, as currently drafted, seems to be a high bar for applying for these credits.

SUMMARY OF RECOMMENDATIONS FOR THE 2027 QAP:

THRESHOLD REQUIREMENTS:

1. Maintain a per project cap, increased to 40%
2. Maintain the mixed income requirement as a threshold item.
3. Maintain the 30% cap for age-specific housing
4. Clarify the Readiness to Proceed language in regards to the local permit approval, and do not require an Act 250 approval as a threshold requirement.
5. Remove the language for funding commitments as it relates to loans from commercial banks.
6. Remove the requirement for a Capital Needs Assessment
7. Remove the requirement that all previous 9% awards must achieve construction loan closings before a developer can apply for a new award. Instead, ask the applicant to provide a narrative update on the status of previous awards and anticipated closing dates.
8. Provide some carve out language for language in regards to an applicant who has participated in a Qualified Contract, where VHFA has approved that transfer due to extreme circumstances.
9. Remove the requirement for electrification of domestic hot water.
10. Replace the Amenities/Opportunities language with the language in the current QAP in regards to the historic settlement pattern, and alignment with the designated centers.
11. Rather than no cap on the developer fee, return to a formula that is similar to the current QAP.

EVALUATION CRITERIA:

1. As found in the current QAP, add scoring for projects that target at least 30% of the units to 50% households.
2. Rather than having three scoring opportunities for projects that have been fortunate to secure PBVs, remove one of the 10 point scoring opportunities.

3. On-site challenges: instead of having a deduction of 10 points for sites that are deemed challenging, move this criteria to a threshold issue. This would provide earlier information to the developer that the site was likely to be too costly or complex, and the developer should not continue to spend money pursuing it.
4. Historic rehab: rather than having a metric of funds covering 110% of the costs, which is a very difficult metric to calculate, award 5 points to projects that are utilizing the HTRC and will receive financial benefits from Vermont's downtown program.
5. Other public funds scoring: increase the amount of funds required for TIF funds from \$100,000 to at least \$15,000/unit.

Thank you for your consideration of our additional comments.

Re: [EXTERNAL]QAP Public Comment

From DevelopmentDept <developmentdept@vhfa.org>

Date Mon 4/27/2026 3:43 PM

To Kaziah Haviland <kaziah@vtrural.org>

Hello Kaziah,

Thank you for taking the time to review the proposed Qualified Allocation Plan. Your comments have been received and will be reviewed by VHFA as we continue to develop the finalized plan.

Best,

Mia

Mia Watson (she/her)

Program Development Director

164 St. Paul St, Burlington VT, 05401 | 802.652.3453

[Vermont Housing Finance Agency](#)

vhf a Affordable homes for a sustainable Vermont

From: Kaziah Haviland <kaziah@vtrural.org>

Sent: Thursday, April 23, 2026 10:03 AM

To: DevelopmentDept <developmentdept@vhfa.org>

Subject: [EXTERNAL]QAP Public Comment

Good morning,

I have just finished reviewing this year's Draft QAP at the urging of some of my former colleagues in affordable housing. I am commenting on behalf of myself, not my organization, but my comment is based on what I see through my current work.

I continue to work in development, but my lense has shifted away from a sole focus on housing. I now work in rural communities across the state for a program that supports groups of people as they work to revitalize their communities. We provide them with TA and funding to take on a community driven development project in their village. This means I have the privilege of doing extensive community engagement with small, rural communities from Lunenburg to Rupert. A request for greater housing options that are affordable to community members sits in the top three needs expressed by residents in EVERY community we have worked with.

You are the experts on our housing deficit, so there is no need for me to go on about this. I just want to highlight that anecdotally, communities see it as a major piece of the puzzle as to why they are losing community members and vitality. About 1/3 of our communities are trying to include some small scale housing in conjunction with a community space/cafe/general store. However, many of them see housing as the next big thing to tackle once the space for community to come together is complete.

I have some concerns reading through the QAP that many of the communities I work with will no longer be able to partner with their local affordable housing provider. While many of these places

have active villages, they don't all meet the standard requirements, such as a nearby pharmacy. Many of these places would require smaller scale buildings, with 20-30 units, to fit within the fabric of their village. A 50 unit project isn't viable. I recognize these projects are harder to develop financially, but it is a hard reality to face that to be able to afford to live, you have to leave your home and move to a large town or city. This exodus has been damaging to many communities. I often hear the story of "my child couldn't afford a place here" or "there was no place for my (adult) child to live except with me so they moved."

You have the data on this, but anecdotally, many of the people looking for housing have jobs. They are teachers' aides, artists, grocery store clerks, people who make 50%-80% AMI. Prioritizing serving 30%ami units feels like it will leave out a lot of the people we work with who are working very hard to make a life for themselves and their families and who want to stay in their hometowns.

Finally, it is also important in these small towns to keep Historic and Brownfield redevelopment projects a priority. They are often the best opportunity these towns have to provide housing.

I hope that you will provide more time for analysis and feedback on the draft and delay implementation of the new QAP. Most of what I have said is anecdotal evidence, but I hope the time is taken to look at numbers and see how this will affect those 2,500-5000 person towns who are struggling to hang on. Those places are such a huge part of the fabric of Vermont. They need to be allowed the opportunity to grow and change with our current culture just as the larger towns and cities do.

Thank you for your consideration!

Kaziah Haviland

Kaziah

Kaziah Haviland

Vermont Council on Rural Development

Village Trust Initiative Director

Phone: 802-222-6990

Web: vtrural.org

Email: kaziah@vtrural.org

PO Box 1384 | Montpelier, VT | 05601



Re: [EXTERNAL]Qualified Allocation Plan

From DevelopmentDept <developmentdept@vhfa.org>

Date Tue 4/28/2026 10:17 AM

To Kris Myerson <kmyerson11@gmail.com>

Hello Kris,

Thank you for taking the time to review the proposed Qualified Allocation Plan, and for your feedback and advocacy for your son and others in the community. Your comments have been received and will be reviewed by VHFA as we continue to develop the finalized plan.

Best,

Mia

Mia Watson (she/her)

Program Development Director

164 St. Paul St, Burlington VT, 05401 | 802.652.3453

Vermont Housing Finance Agency

vhf a Affordable homes for a sustainable Vermont

From: Kris Myerson <kmyerson11@gmail.com>

Sent: Thursday, April 23, 2026 10:35 PM

To: DevelopmentDept <developmentdept@vhfa.org>

Subject: [EXTERNAL]Qualified Allocation Plan

Vermont Housing Finance Agency,

We appreciate the opportunity to comment on the Qualified Allocation Plan (QAP) and urge the Agency to take decisive action to address the critical shortage of service-supported housing for adults with developmental disabilities.

My son is an adult with Autism Spectrum Disorder who requires stable, service-supported housing - not as a preference, but as a necessity for his health, safety, and independence. Our family is among hundreds across Vermont directly affected by this shortage.

The need is urgent and well-documented. The Vermont Developmental Disabilities Council Housing Brief (2023) identifies an immediate statewide shortage of 602 units of service-supported housing. Without adequate housing, adults like my son face institutionalization, crisis-level interventions, or an unsustainable burden on family caregivers - outcomes that are far more costly to the state, and devastating to individuals and families.

We recognize and appreciate the steps taken in previous QAPs to incentivize development of this critical housing type, and we acknowledge the progress that has resulted. However, the data is clear: the pace of development remains far short of what is needed. Hundreds of Vermonters with developmental disabilities continue

to wait.

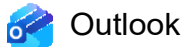
We respectfully but urgently call on the Vermont Housing Finance Agency to prioritize service-supported housing in the strongest possible terms in the current OAP - specifically through:

- Dedicated unit set-asides for adults with developmental disabilities
- Meaningful scoring preferences for developments that include service-supported housing
- Strengthened partnerships with disability service providers in the development process

The time for incremental progress has passed. These are our neighbors, our children, our community members - and they deserve stable, dignified homes now.

Thank you for your serious consideration of this critical need.

Kris Myerson
Arlington




[EXTERNAL]Rural Caucus Letter for Public Comment - VHFA Draft QAP

From Lucy Boyden <Lucy.Boyden@vtleg.gov>

Date Thu 2026-04-23 11:44

To DevelopmentDept <developmentdept@vhfa.org>

Cc Maura Collins <mcollins@vhfa.org>; Lisa Hango <LHango@leg.state.vt.us>; Laura Sibilila <LSibilila@leg.state.vt.us>; Monique Priestley <MPriestley@leg.state.vt.us>

 1 attachment (118 KB)

VHFA Final RC Letter.pdf;

Hi there,

Please see the attached letter for public comment on the draft OAP from the undersigned members of the Rural Caucus.

Thank you,
Lucy

Representative Lucy Boyden

Lamoille-3 | Cambridge & Waterville

Government Operations & Military Affairs, Clerk

Rural Caucus, Clerk

LucyBoydenVT.com



STATE OF VERMONT
GENERAL ASSEMBLY

April 23, 2026

Dear VHFA Staff and Board,

The undersigned members of the Vermont Rural Caucus write to provide input on the proposed 2027-2028 Qualified Allocation Plan (QAP). We represent communities across the state where housing needs are acute, but where development conditions differ in important ways from more densely populated areas. We are concerned that several elements of the current draft may unintentionally limit the ability of rural communities to participate fully in this program.

Across rural Vermont, the challenge is not a lack of demand for housing. It is the difficulty of getting projects to pencil and compete. In smaller markets, with limited infrastructure and fewer units per project, even modest policy or scoring differences can determine whether a proposal moves forward at all. The current framework appears to favor development patterns more common in urban and regional centers, which may leave rural communities at a disadvantage.

We are particularly concerned about siting requirements tied to proximity to services and amenities. While access to services is important, fixed-distance thresholds do not reflect how rural communities function. Development patterns are more dispersed, and local hubs that serve as centers of activity may still fall outside these criteria. In some areas, recent flood impacts have also disrupted services in ways that are temporary but significant. Without flexibility, these requirements risk excluding communities that are otherwise appropriate for housing investment.

We also urge careful consideration of how the plan treats redevelopment of previously used or environmentally challenged sites. In many rural towns, these properties represent some of the most viable opportunities for new housing, particularly within established village centers. Local and nonprofit partners have often taken the lead in bringing these sites back into use, helping to support broader economic activity. Policies that make these projects harder to pursue could slow progress in communities that have fewer alternatives.

Mixed-income development is another area where flexibility is essential. In smaller markets, projects that serve a range of incomes are often the only feasible option. They reflect the economic reality of rural Vermont and help support long-term project stability. Limiting this approach may reduce the number of viable proposals in rural regions.

Finally, we note that several elements of the draft appear to favor larger-scale developments. While these projects have an important role, rural communities often need smaller, incremental development that fits within existing village patterns. Ensuring the program accounts for differences in scale will be critical to maintaining a balanced pipeline of projects across the state.

We offer these comments with the goal of strengthening the OAP so it works effectively for all parts of Vermont. Rural communities are ready to be part of the solution to the state's housing challenges, but they need a framework that reflects their realities.

To that end, we respectfully request consideration of the following adjustments within the draft QAP framework:

- **Siting / Location Efficiency Criteria:** Allow flexible compliance pathways for rural projects, including recognition of functional service hubs, shared services, or planned service restoration, rather than strict fixed-distance thresholds.
- **Scoring and Competitive Criteria:** Review scoring categories to ensure that smaller-scale rural projects are not structurally disadvantaged due to unit count, density, or market size, and can compete on equal footing.
- **Redevelopment/ Infill Incentives:** Maintain or strengthen incentives for redevelopment of previously used or environmentally challenged sites, particularly in designated village centers where these projects are often the most viable.
- **Income Targeting / Project Design:** Preserve flexibility for mixed-income developments where necessary to support financial feasibility and long-term stability in smaller rural markets.
- **Project Scale Considerations:** Ensure that evaluation criteria recognize the role of small and incremental development and do not unintentionally prioritize only larger-scale projects.

We appreciate your consideration and your continued work to address Vermont's housing needs.

Sincerely,

The undersigned Rural Caucus members:

Rep. Laura Sibilila, Dover

Rep. Lucy Boyden, Cambridge

Rep. Lisa Hango, Berkshire

Rep. Beth Quimby, Lyndon

Rep. Monique Priestley, Bradford

Rep. Daniel Noyes, Wolcott

Rep. Doug Bishop, Colchester

Rep. Herb Olson, Starksboro

Rep. Jed Lipsky, Stowe

Rep. Karen Lueders, Lincoln

Rep. Larry Labor, Morgan

Rep. Mark Higley, Lowell

Rep. Marty Feltus, Lyndon

Rep. Rob North, Ferrisburgh

Rep. Saudia LaMont, Morrisville

Rep. Shawn Sweeney, Shelburne

Rep. Thomas F. Charlton, Chester

Rep. VL Coffin, Cavendish

Rep. Woodman H. Page, Newport City

Rep. Zon Eastes, Guilford

Re: [EXTERNAL]Housing Support

From DevelopmentDept <developmentdept@vhfa.org>

Date Thu 2026-04-23 11:47

To Michelle Avery <michellemavery@gmail.com>

Hi Adam and Michelle,

Thank you for taking the time to read through our draft of the Qualified Allocation Plan and for sharing your thoughts with us. I appreciate the advocacy and the perspective that you are providing as caregivers and parents to Joshua, and for advocating on behalf the needs of Vermonters in situations like yourselves.

I will make sure that your feedback is taken into consideration by the team at the Agency as we continue to work on the final version of the Plan.

Thank you,

[Jameson T. Williams](#) (he/him)
Community Development Underwriter
164 St. Paul St, Burlington VT, 05402
[Vermont Housing Finance Agency](#)



From: Michelle Avery <michellemavery@gmail.com>

Sent: Thursday, April 23, 2026 10:13

To: DevelopmentDept <developmentdept@vhfa.org>

Subject: [EXTERNAL]Housing Support

Vermont Housing Finance Agency,

We appreciate the opportunity to comment on the Qualified Allocation Plan.

Our son Joshua Avery has an Intellectual and Developmental Disability (IDD) and will need stable service supported housing to live in when he can no longer live with us, his parents. We are not sure who would take care of him if something happened to us. We desire to be able to place him and settle him while we are still able to, in a safe a stable home with his peers and good care. The state immediately needs 602 units of this housing according to the VTDDC Housing Brief of 2023. We appreciate the support and additions made in past QAPs that help to create development of housing and while there is more development recently, we know you are aware that much more is needed. There are so many adults like our son who need housing.

Thank you for your consideration of our family need for housing.

Adam and Michelle Avery
Williston, VT

PLEASE SEE ATTACHED LETTER

Vermont Housing Finance Agency,

We appreciate the opportunity to comment on the Qualified Allocation Plan.

Our son Joshua Avery has an Intellectual and Developmental Disability (100) and will need stable service supported housing to live in when he can no longer live with us, his parents. We are not sure who would take care of him if something happened to us. We desire to be able to place him and settle him while we are still able to, in a safe a stable home with his peers and good care. The state immediately needs 602 units of this housing according to the VTDDC Housing Brief of 2023. We appreciate the support and additions made in past QAPs that help to create development of housing and while there is more development recently, we know you are aware that much more is needed. There are so many adults like our son who need housing.

Thank you for your consideration of our family need for housing.

Adam and Michelle Avery
Williston, VT

Recommendation:

A. We are requesting that the **new QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the priorities for awarding federal tax credits.** This will help with the development of service supported housing for our son and many others across the state. The QAP is a critical driver in housing policy. Developers receive extra points toward tax credits when they build new units that align with the priorities set forth by the QAP. People with disabilities are more likely to be poor, under or unemployed, and unhoused. As such, they represent a significant constituency within the community of people served by affordable housing organizations. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

B. Permit the creation of a rental subsidy fund for accessible unit

RECOMMENDATION

Many extremely low-income households, especially those on fixed incomes like Supplemental Security Income (SSI), face a significant affordability gap in housing despite meeting the qualifications for affordable units. For these individuals, the cost of rent remains out of reach without further subsidy, leading to a precarious housing situation even within "affordable" housing programs. Implementing an internal rent subsidy policy within affordable housing developments could be a transformative approach to bridging this gap and providing stability for those most in need.

An internal rent subsidy model would allow developers to directly subsidize rents for extremely low-income tenants rather than depending exclusively on external sources, such as vouchers or government-funded rental assistance programs, which are often scarce or unreliable. To make this feasible, developers could be permitted to increase their development fees, stipulating that a portion of these fees be allocated specifically for subsidizing rents within the project. This approach incentivizes developers to incorporate an internal subsidy system while preserving project viability and reducing reliance on unpredictable external funding streams.

Pennsylvania's QAP provides a noteworthy example of this type of internal rent subsidy policy. In Pennsylvania, developers who receive tax credits can increase their allowable developer fees by a certain percentage if they commit to setting aside funds for an internal rent subsidy. This increase enables developers to subsidize extremely low-income residents' rent while preserving the project's financial viability. Key components of Pennsylvania's model include:

- Increased Allowable Developer Fees: Developers can raise their fees beyond standard levels,

specifically when committing a portion of this increase to an internal rent subsidy fund.

- Flexible Use of Subsidy Funds: The allocated subsidy can be applied directly to reduce rents for tenants with the greatest need, typically those earning 20-30% of the area median income (AMI) or who are on fixed incomes like SSI.
- Alignment with Tax Credits: This model works within the LIHTC framework, allowing developers to meet affordability requirements while creating a financial cushion that is a sustainable subsidy source.

C. Create a tax-credit allocation pool for Accessible Supportive Housing (ASH)

RECOMMENDATION

Establish a dedicated Accessible Supportive Housing (ASH) Tax Credit Allocation Pool within the state's Low-Income Housing Tax Credit (LIHTC) program. Modeled after Virginia's Qualified Allocation Plan (QAP), this pool would prioritize developments that:

- Designate at least 15% of units for individuals with disabilities who require supportive services.
- Comply with HUD Section 504 accessibility standards to ensure fully accessible housing options.
- Include project-based rental assistance to make units affordable for extremely low-income households.

Several states have successfully implemented dedicated LIHTC allocation pools for supportive housing, for example:

- The Illinois Housing Development Authority (IHDA) reserves a portion of its LIHTC allocation specifically for supportive housing. The state has successfully utilized this model to develop deeply affordable, accessible housing linked with services, leveraging federal and state resources, including Medicaid waivers and Section 811 PRA.
- Pennsylvania has a dedicated set-aside within its LIHTC Qualified Allocation Plan (QAP) for projects that provide housing for persons with disabilities and other vulnerable populations. This pool has facilitated the expansion of disability-inclusive housing across the state by offering competitive but protected funding opportunities.

By setting aside a specific portion of tax credits for ASH developments, states would streamline funding for disability-inclusive housing and incentivize developers to integrate accessibility and supportive services into their projects.

D. We are also requesting the changes below suggested by the Addison Housing Works, concerning increased requirements for applications that will disadvantage smaller development in rural areas. Many of the individuals with Intellectual and Developmental Disabilities live in rural Vermont and do not wish to move. We are working to develop housing in the places people currently live statewide.

1. Process and Timing

Given the scale of proposed changes, a 30-day public comment period is insufficient. The draft introduces fundamental shifts in threshold requirements, scoring, and underwriting assumptions that warrant deeper analysis and dialogue with practitioners. A nine-month lead time before the 2027 application cycle is also inadequate. Affordable housing projects advance over multiple years; many projects already in predevelopment cannot reasonably pivot to new requirements without added cost, delay, or risk.

Recommendation: Extend the comment period and maintain the current QAP for one additional year to enable a more iterative, transparent revision process in partnership with practitioners.

In addition, we recommend separating the Vermont State Homeownership Tax Credit (SHOTC) allocation plan from the LIHTC and state rental credit QAP. This separation is not precluded by statute and would allow VHFA to advance needed improvements to the SHOTC program on a more immediate timeline, while providing additional time to thoughtfully revise the rental credit QAP. Maintaining a single combined document risks delaying important homeownership policy updates or, alternatively, advancing rental policy changes without sufficient review.

2. Increased Discretion Without Standards

The draft expands VHFA discretion in cost reasonableness, procurement expectations, site evaluation, and builder compensation, while removing or not replacing longstanding benchmarks. Without clear standards, applicants cannot reliably assess competitiveness or structure viable proposals. This undermines the QAP's core function as a transparent, replicable allocation framework.

Recommendation: Reintroduce clear, objective standards for threshold and scoring. Specify how cost reasonableness will be evaluated, what documentation satisfies threshold, and how discretion will be applied consistently. These concerns are particularly evident in the draft's procurement and cost documentation requirements, discussed further below.

3. Misalignment with Development and Financing Realities

Several proposed requirements conflict with standard LIHTC sequencing:

- Procurement and cost documentation: As drafted, the language may be read to require bid-level certainty at application-unachievable prior to award and likely to increase pre-award cost and risk.
- Permanent debt commitments: Requiring fully secured permanent debt at application is inconsistent with underwriting timelines and capital stack assembly.
- Readiness to proceed: Advanced permitting expectations shift substantial pre- award risk onto applicants without funding certainty.
- Pipeline continuity: The development team capacity requirement may constrain pipeline continuity (see Section 4).

Collectively, these provisions increase upfront costs, discourage participation, and reduce viable applications.

Recommendation: Align threshold requirements with typical development timelines. Clarify that projects are not expected to be fully bid at application and set a reasonable standard for procurement documentation (e.g., narrative of approach, evidence of competitive intent, and preliminary cost estimates), without requiring completed bidding or construction-level documentation.

4. Development Team Capacity Requirement

While related to threshold requirements, this provision warrants separate attention due to its potential impact on statewide production. The draft appears to require that applicants have closed construction financing on all previously awarded Ceiling Credit developments before submitting a new application. As written, this functions as a strict threshold. In practice, LIHTC projects often take more than a year to close due to permitting, appeals, procurement, and financing coordination. This requirement would prevent developers from maintaining an annual pipeline.

In Vermont's development model-where a limited number of experienced developers partner with multiple nonprofit sponsors statewide-this would have broader impacts. A project in one community could be blocked by the status of an unrelated project elsewhere, effectively creating a statewide bottleneck tied to individual project timelines. If this is not the intent, the language should be clarified. If it is, it should be reconsidered to better balance capacity management with consistent production across regions.

Recommendation: Replace the blanket requirement with a targeted standard that evaluates pipeline capacity and performance (e.g., limits on open awards, evidence of substantial progress toward closing, or demonstrated track record), and clarify applicability to partnerships and affiliated entities.

5. Policy Inconsistencies

Several provisions create inconsistencies within the policy framework or with broader state housing and land use objectives:

- The absence of basis boost language creates uncertainty around a fundamental component of LIHTC project feasibility and may be an unintended omission.
- The lack of clear cost reasonableness standards (discussed in Section 2) may conflict with the eviction prevention threshold requirements, creating uncertainty around how operating costs for

housing stability programs will be evaluated (discussed further below).

- Site challenge penalties may discourage infill, redevelopment, and brownfield sites despite smart growth priorities.
- Amenities/location requirements may conflict with supporting development in designated centers, particularly in smaller communities.
- Certain design and electrification requirements may outpace current technology readiness and supply chain constraints, conflicting with stated policy goals of increasing housing production and controlling costs.

These tensions risk outcomes that diverge from stated policy goals.

Recommendation: Ensure OAP criteria are consistent with state housing, land use, and climate policies and calibrated to current market and regulatory conditions.

6. Eviction Prevention and Operating Feasibility

We support the draft's emphasis on eviction prevention and housing stability. The concern is not the policy goal itself, but the lack of clarity around how the associated operating costs will be treated in underwriting. Effective eviction prevention requires ongoing staffing, coordination, and programming that carry real and recurring operating costs. For many nonprofit providers, these programs are partially funded through property operations. Without clear guidance, there is a risk that projects could be required to implement eviction prevention while simultaneously being penalized through cost reasonableness review for the associated operating expenses. This creates a disconnect between policy intent and implementation, and may discourage or constrain robust housing stability efforts.

Recommendation: Explicitly recognize eviction prevention and resident services as appropriate and allowable operating expenses within underwriting standards, and ensure that cost reasonableness reviews do not penalize projects for maintaining effective housing stability programs.

7. Geographic Equity and Rural Impacts

Several provisions may unintentionally disadvantage rural communities and smaller-scale developments:

- Amenities and proximity requirements are more easily met in urban areas, limiting competitiveness in rural regions where need remains significant.
- The proposed developer fee structure may favor larger, urban projects that benefit from economies of scale, while making smaller rural developments less viable. Taken together, these provisions risk concentrating resources where projects are easiest to deliver, rather than where need is greatest, exacerbating regional disparities.

Recommendation: Evaluate geographic impacts and ensure a balanced distribution of resources across rural and urban communities. At a minimum, remove or modify the requirement that developments be located within two miles of a pharmacy, which presents a barrier even in larger towns and does not reflect current access patterns given widespread prescription delivery services.

Re: [EXTERNAL]my son Phillip

From DevelopmentDept <developmentdept@vhfa.org>

Date Thu 2026-04-23 11:31

To Maura Lane <maural@gmavt.net>

Hi Maura and Richard,

Thank you for taking the time to review the draft Plan and send us your thoughts. I appreciate the perspective that you've provided us, and the advocacy that you're doing for not only Phillip but other Vermonters who may be in similar situations as your family.

I wanted to reach out to confirm that your feedback was received, and that I am passing it along to the appropriate folks at the Agency as we continue to work on finalizing the Qualified Allocation Plan.

Thank you again,

[Jameson T. Williams](#) (he/him)

Community Development Underwriter

164 St. Paul St, Burlington VT, 05401

[Vermont Housing Finance Agency](#)



From: Maura Lane <maural@gmavt.net>

Sent: Thursday, April 23, 2026 11:14

To: DevelopmentDept <developmentdept@vhfa.org>

Subject: [EXTERNAL]my son Phillip

Vermont Housing Finance Agency,

We appreciate the opportunity to comment on the Qualified Allocation Plan.

Our son, Phillip has (Down Syndrome) an Intellectual and Developmental Disability (IDD), and will need stable service supported housing to live in when he can no longer live with us, his parents. I am 74 and my husband is 79. The state immediately needs 602 units of this housing according to the VTDDC Housing Brief of 2023. We appreciate the support and additions made in past QAPs that help to create development of housing and while there is more development recently, we know you are aware that much more is needed. Thank you for your consideration of our family need for housing.

Maura and Richard Lane, Moretown, Vt.

Re: QAP

From DevelopmentDept <developmentdept@vhfa.org>

Date Mon 4/27/2026 3:51 PM

To Meg Benasich <mbenasich@burrburton.org>

Hello Meg,

Thank you for taking the time to review the proposed Qualified Allocation Plan, and for your feedback and advocacy for your daughter and others in the community. Your comments have been received and will be reviewed by VHFA as we continue to develop the finalized plan.

Best,

Mia

[Mia Watson](#) (she/her)

Program Development Director

164 St. Paul St, Burlington VT, 05401 | 802.652.3453

[Vermont Housing Finance Agency](#)

vhf a Affordable homes for a sustainable Vermont

From: Meg Benasich <mbenasich@burrburton.org>

Sent: Thursday, April 23, 2026 2:54 PM

To: DevelopmentDept <developmentdept@vhfa.org>

Subject: QAP

Vermont Housing Finance Agency,

We appreciate the opportunity to comment on the Qualified Allocation Plan.

Our daughter has an Intellectual and Developmental Disability (IDD), and will need stable service supported housing to live in when **she** can no longer live with us, her parents. The state immediately needs 602 units of this housing according to the VTDDC Housing Brief of 2023. We appreciate the support and additions made in past QAPs that help to create development of housing and while there is more development recently, we know you are aware that much more is needed.

Thank you for your consideration of our family need for housing.

Meg and Don Benasich

DORSET

Recommendation:

A. We are requesting that the **new QAP add language that includes adults with Intellectual and**

Developmental Disabilities (I/DD) in the priorities for awarding federal tax credits. This will help with the development of service supported housing for our son and many others across the state. The QAP is a critical driver in housing policy. Developers receive extra points toward tax credits when they build new units that align with the priorities set forth by the OAP. People with disabilities are more likely to be poor, under or unemployed, and unhoused. As such, they represent a significant constituency within the community of people served by affordable housing organizations. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

B. Permit the creation of a rental subsidy fund for accessible unit

RECOMMENDATION

Many extremely low-income households, especially those on fixed incomes like Supplemental Security Income (SSI), face a significant affordability gap in housing despite meeting the qualifications for affordable units. For these individuals, the cost of rent remains out of reach without further subsidy, leading to a precarious housing situation even within "affordable" housing programs. Implementing an internal rent subsidy policy within affordable housing developments could be a transformative approach to bridging this gap and providing stability for those most in need.

An internal rent subsidy model would allow developers to directly subsidize rents for extremely low-income tenants rather than depending exclusively on external sources, such as vouchers or government-funded rental assistance programs, which are often scarce or unreliable. To make this feasible, developers could be permitted to increase their development fees, stipulating that a portion of these fees be allocated specifically for subsidizing rents within the project. This approach incentivizes developers to incorporate an internal subsidy system while preserving project viability and reducing reliance on unpredictable external funding streams.

Pennsylvania's QAP provides a noteworthy example of this type of internal rent subsidy policy. In Pennsylvania, developers who receive tax credits can increase their allowable developer fees by a certain percentage if they commit to setting aside funds for an internal rent subsidy. This increase enables developers to subsidize extremely low-income residents' rent while preserving the project's financial viability. Key components of Pennsylvania's model include:

- **Increased Allowable Developer Fees:** Developers can raise their fees beyond standard levels, specifically when committing a portion of this increase to an internal rent subsidy fund.
- **Flexible Use of Subsidy Funds:** The allocated subsidy can be applied directly to reduce rents for tenants with the greatest need, typically those earning 20-30% of the area median income (AMI) or who are on fixed incomes like SSI.
- **Alignment with Tax Credits:** This model works within the LIHTC framework, allowing developers to meet affordability requirements while creating a financial cushion that is a sustainable subsidy source.

C. Create a tax-credit allocation pool for Accessible Supportive Housing (ASH)

RECOMMENDATION

Establish a dedicated Accessible Supportive Housing (ASH) Tax Credit Allocation Pool within the state's Low-Income Housing Tax Credit (LIHTC) program. Modeled after Virginia's Qualified Allocation Plan (QAP), this pool would prioritize developments that:

- Designate at least 15% of units for individuals with disabilities who require supportive services.
- Comply with HUD Section 504 accessibility standards to ensure fully accessible housing options.
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Several states have successfully implemented dedicated LIHTC allocation pools for supportive housing, for example:

- The Illinois Housing Development Authority (IHDA) reserves a portion of its LIHTC allocation specifically for supportive housing. The state has successfully utilized this model to develop deeply affordable, accessible housing linked with services, leveraging federal and state resources, including Medicaid waivers and Section 811 PRA.

- Pennsylvania has a dedicated set-aside within its LIHTC Qualified Allocation Plan (QAP) for projects that provide housing for persons with disabilities and other vulnerable populations. This pool has facilitated the expansion of disability-inclusive housing across the state by offering competitive but protected funding opportunities.

By setting aside a specific portion of tax credits for ASH developments, states would streamline funding for disability-inclusive housing and incentivize developers to integrate accessibility and supportive services into their projects.

D. We are also requesting the changes below suggested by the Addison Housing Works, concerning increased requirements for applications that will disadvantage smaller development in rural areas. Many of the individuals with Intellectual and Developmental Disabilities live in rural Vermont and do not wish to move. We are working to develop housing in the places people currently live statewide.

1. Process and Timing

Given the scale of proposed changes, a 30-day public comment period is insufficient. The draft introduces fundamental shifts in threshold requirements, scoring, and underwriting assumptions that warrant deeper analysis and dialogue with practitioners. A nine-month lead time before the 2027 application cycle is also inadequate. Affordable housing projects advance over multiple years; many projects already in predevelopment cannot reasonably pivot to new requirements without added cost, delay, or risk.

Recommendation: Extend the comment period and maintain the current QAP for one additional year to enable a more iterative, transparent revision process in partnership with practitioners.

In addition, we recommend separating the Vermont State Homeownership Tax Credit (SHOTC) allocation plan from the LIHTC and state rental credit QAP. This separation is not precluded by statute and would allow VHFA to advance needed improvements to the SHOTC program on a more immediate timeline, while providing additional time to thoughtfully revise the rental credit QAP. Maintaining a single combined document risks delaying important homeownership policy updates or, alternatively, advancing rental policy changes without sufficient review.

2. Increased Discretion Without Standards

The draft expands VHFA discretion in cost reasonableness, procurement expectations, site evaluation, and builder compensation, while removing or not replacing longstanding benchmarks. Without clear standards, applicants cannot reliably assess competitiveness or structure viable proposals. This undermines the QAP's core function as a transparent, replicable allocation framework.

Recommendation: Reintroduce clear, objective standards for threshold and scoring. Specify how cost reasonableness will be evaluated, what documentation satisfies threshold, and how discretion will be applied consistently. These concerns are particularly evident in the draft's procurement and cost documentation requirements, discussed further below.

3. Misalignment with Development and Financing Realities

Several proposed requirements conflict with standard LIHTC sequencing:

- Procurement and cost documentation: As drafted, the language may be read to require bid-level certainty at application-unachievable prior to award and likely to increase pre-award cost and risk.
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- Readiness to proceed: Advanced permitting expectations shift substantial pre-award risk onto

applicants without funding certainty.

- Pipeline continuity: The development team capacity requirement may constrain pipeline continuity (see Section 4).

Collectively, these provisions increase upfront costs, discourage participation, and reduce viable applications.

Recommendation: Align threshold requirements with typical development timelines. Clarify that projects are not expected to be fully bid at application and set a reasonable standard for procurement documentation (e.g., narrative of approach, evidence of competitive intent, and preliminary cost estimates), without requiring completed bidding or construction-level documentation.

4. Development Team Capacity Requirement

While related to threshold requirements, this provision warrants separate attention due to its potential impact on statewide production. The draft appears to require that applicants have closed construction financing on all previously awarded Ceiling Credit developments before submitting a new application. As written, this functions as a strict threshold. In practice, LIHTC projects often take more than a year to close due to permitting, appeals, procurement, and financing coordination. This requirement would prevent developers from maintaining an annual pipeline.

In Vermont's development model—where a limited number of experienced developers partner with multiple nonprofit sponsors statewide—this would have broader impacts. A project in one community could be blocked by the status of an unrelated project elsewhere, effectively creating a statewide bottleneck tied to individual project timelines. If this is not the intent, the language should be clarified. If it is, it should be reconsidered to better balance capacity management with consistent production across regions.

Recommendation: Replace the blanket requirement with a targeted standard that evaluates pipeline capacity and performance (e.g., limits on open awards, evidence of substantial progress toward closing, or demonstrated track record), and clarify applicability to partnerships and affiliated entities.

5. Policy Inconsistencies

Several provisions create inconsistencies within the policy framework or with broader state housing and land use objectives:

- The absence of basis boost language creates uncertainty around a fundamental component of LIHTC project feasibility and may be an unintended omission.
- The lack of clear cost reasonableness standards (discussed in Section 2) may conflict with the eviction prevention threshold requirements, creating uncertainty around how operating costs for housing stability programs will be evaluated (discussed further below).
- Site challenge penalties may discourage infill, redevelopment, and brownfield sites despite smart growth priorities.
- Amenities/location requirements may conflict with supporting development in designated centers, particularly in smaller communities.
- Certain design and electrification requirements may outpace current technology readiness and supply chain constraints, conflicting with stated policy goals of increasing housing production and controlling costs.

These tensions risk outcomes that diverge from stated policy goals.

Recommendation: Ensure QAP criteria are consistent with state housing, land use, and climate policies and calibrated to current market and regulatory conditions.

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Recommendation: Evaluate geographic impacts and ensure a balanced distribution of resources across rural and urban communities. At a minimum, remove or modify the requirement that developments be located within two miles of a pharmacy, which presents a barrier even in larger towns and does not reflect current access patterns given widespread prescription delivery services.

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Sent from my iPhone

Re: Qualified Allocation Plan

From DevelopmentDept <developmentdept@vhfa.org>
Date Tue 4/28/2026 10:15 AM
To Michele Gallagher <michelegallagher15@gmail.com>

Hello Michele,

Thank you for taking the time to review the proposed Qualified Allocation Plan, and for your feedback and advocacy for your son and others in the community. Your comments have been received and will be reviewed by VHFA as we continue to develop the finalized plan.

Best,
Mia

Mia Watson (she/her)
Program Development Director
164 St. Paul St, Burlington VT, 05401 | 802.652.3453
[Vermont Housing Finance Agency](#)

vhf a Affordable homes for a sustainable Vermont

From: Michele Gallagher <michelegallagher15@gmail.com>
Sent: Thursday, April 23, 2026 6:54 PM
To: DevelopmentDept <developmentdept@vhfa.org>
Subject: Qualified Allocation Plan

Sent from my iPhone

Vermont Housing Finance Agency,

We appreciate the opportunity to comment on the Qualified Allocation Plan.

Our son has ASD an Intellectual and Developmental Disability (IDD), and will need stable service supported housing to live in when he can no longer live with us, his parents. The state immediately needs 602 units of this housing according to the VTDDC Housing Brief of 2023. We appreciate the support and additions made in past QAPs that help to create development of housing and while there is more development recently, we know you are aware that much more is needed.

Thank you for your consideration of our family need for housing.

Michele Gallagher

Manchester Vt.

Recommendation:

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Re: Qualified Allocation Plan

From Mia Watson <MWatson@vhfa.org>
Date Mon 4/27/2026 3:40 PM
To Savage, Patrick D.<Patrick.Savage@uvmhealth.org>

Hello Patrick,
Thank you for taking the time to review the proposed Qualified Allocation Plan, and for your feedback and advocacy for your son and others in the community. Your comments have been received and will be reviewed by VHFA as we continue to develop the finalized plan.
Best,
Mia

[Mia Watson](#) (she/her)
Program Development Director
164 St. Paul St, Burlington VT, 05401 | 802.652.3453
[Vermont Housing Finance Agency](#)

vhf a Affordable homes for a sustainable Vermont

From: Savage, Patrick D.<Patrick.Savage@uvmhealth.org>
Sent: Thursday, April 23, 2026 9:47 AM
To: DevelopmentDept <developmentdept@vhfa.org>
Subject: Qualified Allocation Plan

Vermont Housing Finance Agency,

We appreciate the opportunity to comment on the Qualified Allocation Plan.

Our son has Autism, cortical visual impairment, deafness and Intellectual and Developmental Disability (100), and will need stable service supported housing to live in when he can no longer live with us, his parents. The state immediately needs 602 units of this housing according to the VTDDC Housing Brief of 2023. We appreciate the support and additions made in past QAPs that help to create development of housing and while there is more development recently, we know you are aware that much more is needed.

Thank you for your consideration of our family need for housing.

Patrick, Donna and Jack (our son) Savage

Williston, Vermont

Recommendation:

A. We are requesting that the **new QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the priorities for awarding federal tax credits**. This will help with the development of service supported housing for our son and many others across the state. The QAP is a critical

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D. We are also requesting the changes below suggested by the Addison Housing Works, concerning increased requirements for applications that will disadvantage smaller development in rural areas. Many of the individuals with Intellectual and Developmental Disabilities live in rural Vermont and do not wish to move. We are working to develop housing in the places people currently live statewide.

1. Process and Timing

Given the scale of proposed changes, a 30-day public comment period is insufficient. The draft introduces fundamental shifts in threshold requirements, scoring, and underwriting assumptions that warrant deeper analysis and dialogue with practitioners. A nine-month lead time before the 2027 application cycle is also inadequate. Affordable housing projects advance over multiple years; many projects already in predevelopment cannot reasonably pivot to new requirements without added cost, delay, or risk.

Recommendation: Extend the comment period and maintain the current QAP for one additional year to enable a more iterative, transparent revision process in partnership with practitioners.

In addition, we recommend separating the Vermont State Homeownership Tax Credit (SHOTC) allocation plan from the LIHTC and state rental credit QAP. This separation is not precluded by statute and would allow VHFA to advance needed improvements to the SHOTC program on a more immediate timeline, while providing additional time to thoughtfully revise the rental credit QAP. Maintaining a single combined document risks delaying important homeownership policy updates or, alternatively, advancing rental policy changes without sufficient review.

2. Increased Discretion Without Standards

The draft expands VHFA discretion in cost reasonableness, procurement expectations, site evaluation, and builder compensation, while removing or not replacing longstanding benchmarks. Without clear standards, applicants cannot reliably assess competitiveness or structure viable proposals. This undermines the QAP's core function as a transparent, replicable allocation framework.

Recommendation: Reintroduce clear, objective standards for threshold and scoring. Specify how cost reasonableness will be evaluated, what documentation satisfies threshold, and how discretion will be applied consistently. These concerns are particularly evident in the draft's procurement and cost documentation requirements, discussed further below.

3. Misalignment with Development and Financing Realities

Several proposed requirements conflict with standard LIHTC sequencing:

- Procurement and cost documentation: As drafted, the language may be read to require bid-level certainty at application-unachievable prior to award and likely to increase pre-award cost and risk.
- Permanent debt commitments: Requiring fully secured permanent debt at application is inconsistent with underwriting timelines and capital stack assembly.
- Readiness to proceed: Advanced permitting expectations shift substantial pre-award risk onto applicants without funding certainty.
- Pipeline continuity: The development team capacity requirement may constrain pipeline continuity (see Section 4).

Collectively, these provisions increase upfront costs, discourage participation, and reduce viable applications.

Recommendation: Align threshold requirements with typical development timelines. Clarify that projects are not expected to be fully bid at application and set a reasonable standard for procurement documentation (e.g., narrative of approach, evidence of competitive intent, and preliminary cost estimates), without requiring completed bidding or construction-level documentation.

4. Development Team Capacity Requirement

While related to threshold requirements, this provision warrants separate attention due to its potential impact on statewide production. The draft appears to require that applicants have closed construction financing on all previously awarded Ceiling Credit developments before submitting a new application. As written, this

functions as a strict threshold. In practice, LIHTC projects often take more than a year to close due to permitting, appeals, procurement, and financing coordination. This requirement would prevent developers from maintaining an annual pipeline.

In Vermont's development model-where a limited number of experienced developers partner with multiple nonprofit sponsors statewide-this would have broader impacts. A project in one community could be blocked by the status of an unrelated project elsewhere, effectively creating a statewide bottleneck tied to individual project timelines. If this is not the intent, the language should be clarified. If it is, it should be reconsidered to better balance capacity management with consistent production across regions.

Recommendation: Replace the blanket requirement with a targeted standard that evaluates pipeline capacity and performance (e.g., limits on open awards, evidence of substantial progress toward closing, or demonstrated track record), and clarify applicability to partnerships and affiliated entities.

5. Policy Inconsistencies

Several provisions create inconsistencies within the policy framework or with broader state housing and land use objectives:

- The absence of basis boost language creates uncertainty around a fundamental component of LIHTC project feasibility and may be an unintended omission.
 - The lack of clear cost reasonableness standards (discussed in Section 2) may conflict with the eviction prevention threshold requirements, creating uncertainty around how operating costs for housing stability programs will be evaluated (discussed further below).
 - Site challenge penalties may discourage infill, redevelopment, and brownfield sites despite smart growth priorities.
 - Amenities/location requirements may conflict with supporting development in designated centers, particularly in smaller communities.
 - Certain design and electrification requirements may outpace current technology readiness and supply chain constraints, conflicting with stated policy goals of increasing housing production and controlling costs.
- These tensions risk outcomes that diverge from stated policy goals.

Recommendation: Ensure OAP criteria are consistent with state housing, land use, and climate policies and calibrated to current market and regulatory conditions.

6. Eviction Prevention and Operating Feasibility

We support the draft's emphasis on eviction prevention and housing stability. The concern is not the policy goal itself, but the lack of clarity around how the associated operating costs will be treated in underwriting. Effective eviction prevention requires ongoing staffing, coordination, and programming that carry real and recurring operating costs. For many nonprofit providers, these programs are partially funded through property operations. Without clear guidance, there is a risk that projects could be required to implement eviction prevention while simultaneously being penalized through cost reasonableness review for the associated operating expenses. This creates a disconnect between policy intent and implementation, and may discourage or constrain robust housing stability efforts.

Recommendation: Explicitly recognize eviction prevention and resident services as appropriate and allowable operating expenses within underwriting standards, and ensure that cost reasonableness reviews do not penalize projects for maintaining effective housing stability programs.

7. Geographic Equity and Rural Impacts

Several provisions may unintentionally disadvantage rural communities and smaller-scale developments:

- Amenities and proximity requirements are more easily met in urban areas, limiting competitiveness in rural regions where need remains significant.
- The proposed developer fee structure may favor larger, urban projects that benefit from economies of scale, while making smaller rural developments less viable. Taken together, these provisions risk concentrating resources where projects are easiest to deliver, rather than where need is greatest, exacerbating regional disparities.

Recommendation: Evaluate geographic impacts and ensure a balanced distribution of resources across rural and urban communities. At a minimum, remove or modify the requirement that developments be located

within two miles of a pharmacy, which presents a barrier even in larger towns and does not reflect current access patterns given widespread prescription delivery services.

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[EXTERNAL]Pennrose Comments, Draft QAP

From Rebecca Schofield <rschofield@penrose.com>

Date Thu 2026-04-23 16:27

To DevelopmentDept <developmentdept@vhfa.org>

Cc Karmen Cheung <kcheung@penrose.com>; Joe Gatti <JGatti@penrose.com>

 1 attachment (272 KB)

Pennrose - VT OAP Comments - Due 4-24-2026.pdf;

Hello,

Please see attached comments from Pennrose on VHFA's current draft QAP. Thanks for your consideration!

Best,

Becca

PENROSE
Bricks & Mortar | Heart & Soul

Penrose.com

Rebecca Schofield
Senior Developer
Pennrose, LLC



50 Milk Street, 16th Floor | Boston, MA "02109"

Phone: 617.955.6712 | Email: rschofield@penrose.com

Mission: Our committed team of exceptional professionals transforms communities by creating high quality real estate developments and delivering outstanding value to our clients and partners.

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April 23, 2026

To the VHFA Board of Commissioners,

We appreciate the opportunity to review and comment on the current draft of VHFA's Qualified Allocation Plan. Please see detailed comments below and thank you for considering our feedback as part of this OAP update.

Pennrose is a nationally recognized, award-winning developer, owner, and operator of high-quality affordable and mixed-income housing. Our New England team brings extensive experience delivering complex, phased development efforts in partnership with municipalities and public agencies. In the last five years alone, Pennrose has completed over 1,000 units of affordable, workforce, and market rate housing in Massachusetts, Connecticut, and Rhode Island with another 750 units under construction or in the design process. Pennrose's affiliated property management company, Pennrose Management Company, manages our portfolio of over 25,000 units and is actively involved throughout the process to ensure the properties are designed in a way that they can be managed efficiently and effectively in the long term.

Amenities/Opportunities and Incompatible Uses

The requirement that new construction must be close to existing resources is extremely limiting in a rural state where development may be prevented by existing development rather than planning for future housing production and smart growth. Specifically, there are relatively few pharmacies statewide and future residents have alternate options for getting medications and medical equipment without relying on physical pharmacies (medication delivery/similar services).

In order to support development in locations that could really use more housing to serve existing populations but may not have a high concentration of the amenities listed, please consider increasing the radius from 2 miles and/or incentivizing services to help future residents access the resources they need (e.g. coordination of shuttle/delivery services). We believe the goal of this section is covered by 4.08.

Project Based Rent Assistance

The incentive for covering 25% of the project with Project Based Rent Assistance (typically a Section 8 HAP contract) will limit the size of projects. A development can only cover eight (8) units with project-based Section 8s before triggering Davis Bacon and significantly increasing the cost of the project; therefore, well-scoring projects would be capped at 32 units (8 units x 4). While this may work for some sites, it will severely hinder the development of others to achieve scale needed for successful operation and leveraging of scarce financial resources.

Land Donation and On Site Challenged

We understand that land donation will help control total project costs, but it's one of many levers a developer can pull to make a project financially feasible. Flexibility is best here; developers are already looking for opportunities for land donation, but it's irrelevant to the overall quality and feasibility of a project. Similarly, if a potential site for development is well-located but has on-site challenges, developers should have the flexibility to manage these costs without a point deduction at application.

Sincerely,



Karmen Cheung
Regional Vice President, Pennrose LLC

Outlook

[EXTERNAL]QAP Public Comment

From Adam Grinold <agrinold@brattleborodevelopment.com>

Date Fri 2026-04-24 17:05

To DevelopmentDept <developmentdept@vhfa.org>

Cc Alex Farrell <alex.farrell@vermont.gov>; Maura Collins <mcollins@vhfa.org>; g.seelig@vhcb.org <g.seelig@vhcb.org>; Kathleen Berk <kathleen@vsha.org>; kristin.mcclure@vermont.gov <kristin.mcclure@vermont.gov>

@ 1 attachment (512 KB)

QAP Public Comment.pdf;

Please find the attached letter from the Brattleboro Development Credit Corporation (BDCC) regarding the proposed changes to the 2027-2028 Qualified Allocation Plan (QAP).

As the Regional Development Corporation for Windham County, we are writing to express our concerns about how these proposed policies may create new barriers for rural housing starts and impact the economic health of our business community.

Our comments highlight specific concerns regarding the feasibility of smaller-scale projects in village centers, and the increased financial risks associated with the new threshold requirements. We respectfully request that the VHFA consider extending the timeline for these changes to allow for further dialogue with rural stakeholders.

Thank you for the opportunity to provide this feedback.

Sincerely,

Adam Grinold

Executive Director

**Brattleboro Development Credit Corporation
Southeastern Vermont Economic Development
Strategies**

Office: 802-257-7731

Mobile: 802 780-7828

brattleborodevelopment.com



BDCC
BUSINESS
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REAL ESTATE &
DEVELOPMENT

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COMMUNITY
DEVELOPMENT &
CAPACITY BUILDING

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WORKFORCE
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DEVELOPMENT

The work of BDCC is made possible in part by a grant from the State of Vermont through the Agency of Commerce and Community Development. This institution is an equal opportunity provider and employer.

Southern Vermont's Economic Catalyst



**BRATTLEBORO
DEVELOPMENT
CREDIT CORPORATION**



April 24, 2026

Vermont Housing Finance Agency

164 Saint Paul Street

Burlington, VT 05402

Via email: developmentdept@vhfa.org

To whom it may concern,

On behalf of the Brattleboro Development Credit Corporation (BDCC), I am writing to provide comments regarding the proposed changes to the 2027-2028 Qualified Allocation Plan (QAP). As the certified Regional Development Corporation for Windham County, our mission is to invest in the drivers of our regional economy so that people, businesses, and communities in Southeastern Vermont can thrive. A healthy business community is impossible without accessible housing for our workforce. While we appreciate the new tools Vermont has recently deployed to address the housing crisis, we are concerned that the proposed QAP creates new, unnecessary barriers that will disproportionately harm housing starts in rural regions.

The proposed shift from a percentage-based development fee to a unit-based formula and the removal of the 30% per-project allocation cap clearly favor large-scale developments. In Windham County, our projects are typically right-sized for our village centers, often 20-30 units rather than the 100+ unit projects seen in larger urban markets. By incentivizing larger projects, the QAP threatens the financial sustainability of the very developers who focus on our rural communities.

The new requirement that projects be located within a 2-mile radius of specific amenities, such as full-service grocery stores and pharmacies, is a one-size-fits-all approach that ignores rural realities. For instance, the redevelopment of the Chalet parcel in West Brattleboro, which aims to provide over 70 new homes, would be ineligible under these rules despite being on a bus line and connected to municipal infrastructure. Historical revitalization projects like the Howard Block in Bellows Falls, which was a catalysts for economic growth, would likely fail to be competitive under this draft.



The requirement for final land use permits and Capital Needs Assessments at the time of application forces developers to take on massive predevelopment financial risks before they even know if a project will be funded. For rural developers with thinner margins, this chilling effect could stop projects before they even begin.

Housing is the backbone of economic development. To ensure Windham County remains a place where people can live and work, we respectfully request that the current 2025-2026 QAP remains in effect for another year to allow for meaningful stakeholder dialogue. We urge the agency to adjusting threshold requirements to recognize the viability of village centers and residential neighborhoods that utilize public transit. Rural Vermont is not an afterthought; it is a vital part of the state's economic engine, and we urge you to revise this plan to support our communities.

Sincerely,



Adam Grinold

Executive Director, BDCC

CC: Alex Farrell, Commissioner, DHCD;

Maura Collins, Executive Director, **VHFA**;

Gustave Seelig, Executive Director, VHCB; Kathleen Berk, Executive Director, VSHA; Kristin McClure, Governor Appointee.

Re: [EXTERNAL]QAP Public Comment

From DevelopmentDept <developmentdept@vhfa.org>

Date Tue 4/28/2026 11:53 AM

To Noonan, Anna <Anna.Noonan@cvmc.org>; Jay.Ericson@cvmc.org <Jay.Ericson@cvmc.org>

Hello Anna,

Thank you for taking the time to review the proposed Qualified Allocation Plan. Your comments have been received and will be reviewed by VHFA as we continue to develop the finalized plan.

Best,

Mia

Mia Watson (she/her)

Program Development Director

164 St. Paul St, Burlington VT, 05401 | 802.652.3453

[Vermont Housing Finance Agency](#)

vhf a Affordable homes for a sustainable Vermont

From: Ericson, Jay <Jay.Ericson@cvmc.org> on behalf of Noonan, Anna <Anna.Noonan@cvmc.org>

Sent: Friday, April 24, 2026 8:41 AM

To: DevelopmentDept <developmentdept@vhfa.org>

Cc: Alex Farrell <alex.farrell@vermont.gov>; Maura Collins <mcollins@vhfa.org>; g.seelig@vhcb.org <g.seelig@vhcb.org>; Kathleen Berk <kathleen@vsha.org>; kristin.mcclure@vermont.gov <kristin.mcclure@vermont.gov>

Subject: [EXTERNAL]QAP Public Comment

April 24, 2026

Vermont Housing Finance Agency

Development Department

164 St. Paul Street

Burlington, VT 05402

Re: Comments on Draft 2027-2028 Qualified Allocation Plan

Dear VHFA Development Team,

On behalf of **Central Vermont Medical Center (CVMC)**, thank you for the opportunity to comment on the draft **Qualified Allocation Plan (QAP)**.

As the largest healthcare provider serving Central Vermont, we experience firsthand every day the connection between the health of our community and access to safe, stable, and affordable housing.

Housing stability is one of the most powerful social determinants of health-particularly in rural Vermont. When individuals and families have secure housing, they are better able to manage chronic conditions, access preventive care, maintain employment, and support their mental well-being. Conversely, housing

instability contributes to increased stress, delayed care, higher emergency department use, and poorer overall health outcomes.

At Central Vermont Medical Center, we see these impacts daily. Patients without stable housing face greater barriers to recovery, continuity of care, and long-term health. In rural communities, where housing options are limited and distances to care are greater, the effects of unstable or unaffordable housing are amplified.

Healthy communities depend on more than medical care alone. They require a strong foundation that includes safe places to live, a stable workforce, and the ability for people to remain connected to their communities. Investing in affordable housing is not just a housing solution-it is a public health strategy that strengthens families, supports the workforce, and sustains rural healthcare systems.

We are concerned that the proposed changes to the QAP are being advanced with only a **30-day review period**, despite representing significant shifts in both process and funding priorities. From our perspective, there has not been sufficient time to fully assess how these changes may impact housing availability-particularly in **rural communities**, where housing needs are acute and development options are already limited.

Before these changes are finalized, we strongly urge **VHFA** to provide additional time for analysis and stakeholder input. It is critical that service providers, developers, and communities have a meaningful opportunity to understand and evaluate how these changes will affect the creation of housing that Vermonters can afford and access-across all regions of the state.

Specifically, we respectfully request:

- **Additional time** to evaluate the potential impacts of the proposed changes
- **A delay in implementation** to avoid disrupting projects currently in development
- **Careful consideration** of how these changes affect the feasibility of housing development in rural communities

Thank you for your consideration and for your continued commitment to improving housing outcomes for Vermont's most vulnerable residents. We appreciate the opportunity to share our perspective and look forward to continued dialogue.

Sincerely,



Anna Tempesta Noonan (she/her)
President, COO
Central Vermont Medical Center
Anna.Noonan@cvmc.org
802-371-4105




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[EXTERNAL]QAP Public Comment

From Brice Blaisdell <Brice.Blaisdell@uvs-vt.org>
on behalf of
UVS Housing Team <UVSHousingTeam@uvs-vt.org>
Date Fri 2026-04-24 15:13
To DevelopmentDept <developmentdept@vhfa.org>

 1 attachment (159 **KB**)
QAP Public Comment_Upper Valley Services_4-27-26.pdf;

Please find attached a letter from our Executive Director, Gloria Quinn regarding changes to the Qualified Allocation Plan.

Brice Blaisdell
Housing and Development Manager
Upper Valley Services
PO Box 405
Randolph, VT 05060
802-356-0588

<https://1in.k.edgepilot.com/s/b19b0d9f/biL7aREgKOaqK2rFy4txGA?u=http://www.uvs-vt.org/>



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April 24, 2026

Vermont Housing Finance Agency
Development Department
164 St. Paul Street
Burlington, VT 05402

Re: Comments on Draft 2027-2028 Qualified Allocation Plan

Dear VHFA Development Team,

On behalf of Upper Valley Services (UVS), we appreciate the opportunity to comment on the draft Qualified Allocation Plan (QAP). Our organization provides community-based support for individuals with intellectual and developmental disabilities (I/DD) by offering a range of person-centered services, including housing. For Vermonters with intellectual and developmental disabilities, housing stability is essential to maintaining health, safety, and participation in community life.

Without stable housing and support, individuals cannot maintain employment, engage consistently in services, manage their health needs, and/or avoid crisis. For people with I/DD, losing housing is destabilizing, resulting in higher costs, poorer outcomes, and preventable harm.

Many of the individuals we serve cannot afford rents at standard LIHTC levels. We are concerned that reduced support for 50% AMI units, combined with a stronger emphasis on 30% AMI units without guaranteed rental assistance, could result in fewer units that are actually deliverable. Housing that depends on subsidies that are not consistently available risks not being built at all.

UVS is the Designated Agency (DA) serving individuals with I/DD for Orange County and surrounding areas such as Washington and Lamoille Counties. Most of the Vermonters we serve live in rural communities. We are concerned that changes affecting smaller projects, historic reuse, and development in rural areas will reduce housing opportunities for these individuals.

Bradford
PO Box 930
Bradford, VT 05033
802-222-9235

Moretown
66 Dickerson Rd
Moretown, VT 05660
802-560-8575

Randolph
PO Box 405
Randolph, VT 05060
802-728-4476

Essex
PO Box 5493
Essex Jct., VT 05453
802-662-5978

Before these changes are finalized, we strongly urge VHFA to provide additional time for analysis and feedback. It is critical that service providers, developers, and communities can fully assess how these changes will affect the ability to create housing that meets real needs across Vermont.

We respectfully request:

- Additional time to evaluate the impacts of the proposed changes
- Delay of implementation to avoid disrupting projects currently in development
- Consideration of how these changes affect the feasibility of housing in rural communities

Thank you for your consideration and for your continued commitment to affordable housing for Vermont's most vulnerable residents.

Sincerely,



Gloria M. Quinn
Executive Director
Upper Valley Services

[EXTERNAL]QAP Public Comment

From Bruce Whitney <bwhitney@homemattershere.org>
Date Fri 2026-04-24 13:27
To DevelopmentDept <developmentdept@vhfa.org>
Cc Elizabeth Bridgewater <ebridgewater@homemattershere.org>

 1 attachment (80 KB)

WWHT Comments re SHOTC QAP LH.docx;

Dear Development Department,

Please find the attached public comment letter regarding the QAP SHOTC guidelines.

Regards,

Bruce Whitney, NMLS Lic# 4140471 *Director of Homeownership*
Windham & Windsor Housing Trust

Cell: 802-490-6055

Direct: 802-246-2111

Main: 802-254-4604

bwhitney@homemattershere.org

68 Birge Street

Brattleboro, VT 05301

HomeMattersHere.org

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April 23, 2024

Dear VHFA Development staff,

Thank you for the opportunity to provide comments on the draft 2027-2028 Qualified Allocation Plan (OAP). We appreciate VHFA's interest in developers' experience and opinions. On behalf of Windham & Windsor Housing Trust (WWHT), I offer the following comments specific to **Vermont State Homeownership Tax Credits (SHOTC)**:

Section 3.18 Maximum Developer Fees

The proposed fee structure would work well for homeownership projects with a maximum of \$35,000 per unit for new construction. With homeownership projects, the fee is typically collected at the sale of the homes.

Section 5.2 Vermont State Homeownership Tax Credits (SHOTC.)

It would be helpful to make a distinction between the \$250,000 first-year credit allocation set aside for manufactured home purchase and replacement that may be used as an affordable housing source for future owners or buyers - i.e.: a loan; and the remainder of the \$675,000 first year credit allocation that will be used as grants to maintain permanently affordable owner-occupied units.

This provision would recognize that maintaining permanent affordability requires different approaches for stick-built homes compared to manufactured homes. Manufactured homes do not need the same unit specific affordability because they do not appreciate in value like stick-built homes.

In addition, most if not all stick-built homes funded through SHOTC require other subsidies. The primary source for these subsidies is the Vermont Housing and Conservation Board's (VHCB) homeownership program. The VHCB program provides grants to make the units permanently affordable by requiring that homeowners who purchase these home share 75% of the appreciation of the home to maintain its affordability to the next buyers. Because stick-built homes typically increase in value, this restriction maintains the home's affordability without the need for additional subsidy at resale. The SHOTC requirements should match the VHCB requirements. If SHOTC funds are provided as loans, the repayment would not grow with the home value, and over time VHFA would need to increase the amount of SHOTC subsidy to keep the same home affordable.

Windham & Windsor Housing Trust
68 BIRGE STREET
BRATTLEBORO, VT 05301
Phone (802) 254-4604 Fax (802) 254-4656

www.HomeMattersHere.org



Funding Amounts

There are two significant components of determining funding needed - setting the sales price and setting the maximum income eligibility - the affordability window. We would advocate that the window should be at least 30% - the price should be set so that there is no less than a 30% difference between the income used to set the price and the maximum eligible income. We suggest that the prices be set using a household of 1.5 people per bedroom spending 30% of household income towards their monthly housing costs.

Importantly, unit prices cannot vary based on income. Homes are posted for sale at a specific price, and buyers qualify for financing based on that price. Also, development budgets assume sales at that price to fund the project costs. In addition, variable pricing for identical homes creates challenges for future resales. For example, two identical homes can be for sale at the same time with radically different prices, which would significantly disadvantage the seller of the higher priced home. To address the concern that some households might receive too much subsidy, the definition of eligible buyers in the "Income Limits" section can state the minimum amount of income a household must pay toward housing costs.

Income Limits

The maximum income eligibility should be 30% higher than the income used to set the price; provided, that there is the ability to make exceptions for higher income households that are not otherwise able to afford to purchase a home on the open market. This is clear, fair and proven to provide a reasonable window for a variety of household sizes with a diverse array of financial profiles to qualify to purchase homes. A broad range of HUD AMI income eligibility is needed because median renter income is generally much lower than HUD AMI income, which includes both homeowners and renters. For example, in Windham County the HUD AMI for family of 4 is \$96,600. The rental household median income is \$43,328¹. Pricing a home for a family at 80% AMI means the target market of renters needs to earn 173% of rental median income. Having a broad range of AMI ensures that we can have a sufficient pool of buyers of varied financial profiles that can qualify. Furthermore, there are about 1300 renters in Windham County earning between \$60,000 and \$95,000². Many renters are satisfied with their rental situation and are not interested in homeownership. Qualifying for a mortgage is a more rigorous process than qualifying for a rental. Therefore, the actual number of renters who are actively seeking homeownership and mortgage ready will be much less than the general pool. The location of the new homes and the style and bedroom count of the new homes further reduces the pool of interested, mortgage-ready buyers. Thus, we need a broad range of general population AMI to ensure timely and efficient absorption of the new units. Finally, having a broad range of eligible AMI ensures that renters from varied rental situations including subsidized, market rate and above--market rate can take advantage of purchasing a new home which provides fluidity in the housing market that is very much needed for the success of all the various efforts to support and spur a healthy housing market.

¹ Housingdata.org

² Housingdata.org

In addition, we would support the following:

- Regardless of income eligibility, households must pay at least 20% of their income on housing. A household with a housing ratio of less than 20% would be deemed ineligible, provided that VHFA could grant an exception to this based on the facts and circumstances of a particular household's needs. Determination of compliance with the minimum housing ratio would be made at the time of contract. Note that the calculation of the housing ratio should not include any buyer-driven down payment assistance, such as VHFA's Assist and First Generation Homebuyer programs and the Federal Home Loan Bank of Boston's Equity Builder Program, as these programs are designed to build wealth for groups that historically have not had access to homeownership and the wealth building benefits associated therewith.
- Developers must have a buyer selection policy that favors the lowest income eligible households when selecting buyers for these homes, including at resale when there is sufficient demand to warrant a selection policy.
- Buyer incomes to be determined using VHFA first mortgage underwriting guidelines in effect as of the date of SHOTC application.
- The income limit at resale should be 120% of area median income. This maintains affordability of the home, while allowing sellers a sufficient pool of eligible buyers when they go to sell their resale restricted home. In this way we are not further disadvantaging Shared Equity homeowners who are sharing 75% of the appreciation. Resales would be subject to the buyer selection policy in order to favor the lowest income eligible household.

SHOTC Application Scoring Rubric

We appreciate VHFA's efforts to make the application process objective, transparent and fair. We believe that the following modifications to the proposed scoring rubric will allow VHFA to meet its policy goals of promoting the cost-effective development of affordable homes across the State of Vermont:

- *Item #1:* We suggest adjusting the scoring method to ensure regional parity. There are many regions in Vermont that need more homeownership opportunities as documented by housing needs assessments where a large subdivision (10 or more homes) or condominium development would not be feasible given available infrastructure, smart growth principals, and market demand (not need). See also comment in #3.
- *Item #2:* Rename the item to "Promoting Deeper Affordability". We also suggest adding a point to this section to recognize the developers serving lower income households who are the least likely to purchase homes on the open market. See also comment to item #6(7).
- *Item #3:* Replace "region" and "area" with "municipality" to provide clarity and parity in comparing geographies. Add that documented unmet need can be established by the applicable jurisdiction's housing needs assessment. In relation to #1, developers who have a track record and potential pipeline of smaller unit count developments that fit into the regional and municipal plans and meet smart growth principals including in-fill and Homes

for All-- 'Missing Middle' housing³ should be promoted not penalized for successive applications within 5 years.

- *Item #5:* (listed as # 6 in the OAP): We suggest that this item be weighed equally with item #2 (as modified per our suggestion above). Complex larger new construction projects are more costly and often located in areas where low-income people are already being priced out of the market. To preserve affordability in those markets it is important to allow those types of projects to seek greater subsidy.
- *Item #6* (listed as #7 in the draft OAP): While an important policy objective, it is not clear how applicants demonstrate that they are prioritizing underserved households in a meaningful and objective way. By adding a point to item #2 to favor lower income targeting, the scoring rubric will support projects that reach underserved households and historically marginalized communities.

Thank you for your work updating the OAP and including us in the conversation.

Sincerely,

A handwritten signature in blue ink that reads "B. Whitney". The signature is written in a cursive, slightly slanted style.

Bruce Whitney

Director of Homeownership

³ <https://accd.vermont.gov/current-initiatives/homesforall>

Re: Qualified Allocation Plan

From DevelopmentDept <developmentdept@vhfa.org>

Date Tue 4/28/2026 10:17 AM

To Beth Wilson <bethawilson1@gmail.com>

Hello Beth,

Thank you for taking the time to review the proposed Qualified Allocation Plan, and for your feedback and advocacy for your son and others in the community. Your comments have been received and will be reviewed by VHFA as we continue to develop the finalized plan.

Best,

Mia

[Mia Watson](#) (she/her)

Program Development Director

164 St. Paul St, Burlington VT, 05401 | 802.652.3453

[Vermont Housing Finance Agency](#)

vhf a Affordable homes for a sustainable Vermont

From: Beth Wilson <bethawilson1@gmail.com>

Sent: Friday, April 24, 2026 7:01 AM

To: DevelopmentDept <developmentdept@vhfa.org>

Subject: Qualified Allocation Plan

Hello,

I appreciate the opportunity to comment on the Qualified Allocation Plan.

My son is on the Autism Spectrum, an Intellectual and Developmental Disability (IDD), and will need stable service-supported housing to live in when he can no longer live with me, his mom. My husband unexpectedly passed away in February, emphasizing our need to be prepared at any moment. The state immediately needs 602 units of this housing according to the VTDDC Housing Brief of 2023. We appreciate the support and additions made in past QAPs that help create housing, and while there has been more development recently, we know you are aware that much more is needed.

Thank you for considering my family's housing needs.

Beth A Wilson

Williston

Recommendation:

A. I am requesting that the **new QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the priorities for awarding federal tax credits.** This will help develop service-supported housing for my son and many others across the state.

The QAP is a critical driver in housing policy. Developers receive extra points toward tax credits when they build new units that align with the priorities set forth by the QAP. People with disabilities are more likely to be poor, under- or unemployed, and unhoused. As such, they represent a significant constituency within the community of people served by affordable housing organizations. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

B. Permit the creation of a rental subsidy fund for accessible unit

RECOMMENDATION

Many extremely low-income households, especially those on fixed incomes like Supplemental Security Income (SSI), face a significant affordability gap in housing despite meeting the qualifications for affordable units. For these individuals, the cost of rent remains out of reach without further subsidy, leading to a precarious housing situation even within "affordable" housing programs. Implementing an internal rent subsidy policy within affordable housing developments could be a transformative approach to bridging this gap and providing stability for those most in need.

An internal rent subsidy model would allow developers to directly subsidize rents for extremely low-income tenants rather than depending exclusively on external sources, such as vouchers or government-funded rental assistance programs, which are often scarce or unreliable. To make this feasible, developers could be permitted to increase their development fees, with a portion allocated specifically to subsidizing rents within the project. This approach incentivizes developers to incorporate an internal subsidy system while preserving project viability and reducing reliance on unpredictable external funding streams.

Pennsylvania's QAP provides a noteworthy example of this type of internal rent subsidy policy. In Pennsylvania, developers who receive tax credits can increase their allowable developer fees by a certain percentage if they commit to setting aside funds for an internal rent subsidy. This increase enables developers to subsidize the rent of extremely low-income residents while preserving the project's financial viability. Key components of Pennsylvania's model include:

- **Increased Allowable Developer Fees:** Developers can raise their fees beyond standard levels, specifically when committing a portion of this increase to an internal rent subsidy fund.
- **Flexible Use of Subsidy Funds:** The allocated subsidy can be applied directly to reduce rents for tenants with the greatest need, typically those earning 20-30% of the area median income (AMI) or who are on fixed incomes like SSI.
- **Alignment with Tax Credits:** This model works within the LIHTC framework, allowing developers to meet affordability requirements while creating a financial cushion that is a sustainable subsidy source.

C. Create a tax-credit allocation pool for Accessible Supportive Housing (ASH)

RECOMMENDATION

Establish a dedicated Accessible Supportive Housing (ASH) Tax Credit Allocation Pool within the state's Low-Income Housing Tax Credit (LIHTC) program. Modeled after Virginia's Qualified Allocation Plan (QAP), this pool would prioritize developments that:

- Designate at least 15% of units for individuals with disabilities who require supportive services.
- Comply with HUD Section 504 accessibility standards to ensure fully accessible housing options.
- Include project-based rental assistance to make units affordable for extremely low-income households.

Several states have successfully implemented dedicated LIHTC allocation pools for supportive housing, for example:

- The Illinois Housing Development Authority (IHDA) reserves a portion of its LIHTC allocation specifically for supportive housing. The state has successfully utilized this model to develop

deeply affordable, accessible housing linked with services, leveraging federal and state resources, including Medicaid waivers and Section 811 PRA.

- Pennsylvania has a dedicated set-aside within its LIHTC Qualified Allocation Plan (QAP) for projects that provide housing for persons with disabilities and other vulnerable populations. This pool has facilitated the expansion of disability-inclusive housing across the state by offering competitive but protected funding opportunities.

By setting aside a specific portion of tax credits for ASH developments, states would streamline funding for disability-inclusive housing and incentivize developers to integrate accessibility and supportive services into their projects.

D. I am also requesting the changes below, suggested by the Addison Housing Works, concerning increased requirements for applications that will disadvantage smaller developments in rural areas. Many individuals with Intellectual and Developmental Disabilities live in rural Vermont and do not wish to move. We are working to develop housing in the places people currently live statewide.

1. Process and Timing

Given the scale of proposed changes, a 30-day public comment period is insufficient. The draft introduces fundamental shifts in threshold requirements, scoring, and underwriting assumptions that warrant deeper analysis and dialogue with practitioners. A nine-month lead time before the 2027 application cycle is also inadequate. Affordable housing projects advance over multiple years; many projects already in predevelopment cannot reasonably pivot to new requirements without added cost, delay, or risk.

Recommendation: Extend the comment period and maintain the current QAP for one additional year to enable a more iterative, transparent revision process in partnership with practitioners. In addition, we recommend separating the Vermont State Homeownership Tax Credit (SHOTC) allocation plan from the LIHTC and state rental credit QAP. This separation is not precluded by statute and would allow VHFA to advance needed improvements to the SHOTC program on a more immediate timeline, while providing additional time to thoughtfully revise the rental credit QAP. Maintaining a single combined document risks delaying important homeownership policy updates or, alternatively, advancing rental policy changes without sufficient review.

2. Increased Discretion Without Standards

The draft expands VHFA's discretion regarding cost reasonableness, procurement expectations, site evaluation, and builder compensation, while removing or failing to replace longstanding benchmarks. Without clear standards, applicants cannot reliably assess competitiveness or structure viable proposals. This undermines the QAP's core function as a transparent, replicable allocation framework.

Recommendation: Reintroduce clear, objective standards for threshold and scoring. Specify how cost reasonableness will be evaluated, what documentation satisfies the threshold, and how discretion will be applied consistently. These concerns are particularly evident in the draft's procurement and cost documentation requirements, discussed further below.

3. Misalignment with Development and Financing Realities

Several proposed requirements conflict with standard LIHTC sequencing:

- Procurement and cost documentation: As drafted, the language may be read to require bid-level certainty at application-unachievable prior to award and likely to increase pre-award cost and risk.
- Permanent debt commitments: Requiring fully secured permanent debt at application is inconsistent with underwriting timelines and capital stack assembly.
- Readiness to proceed: Advanced permitting expectations shift substantial pre-award risk onto applicants without funding certainty.
- Pipeline continuity: The development team capacity requirement may constrain pipeline continuity (see Section 4).

Collectively, these provisions increase upfront costs, discourage participation, and reduce viable applications.

Recommendation: Align threshold requirements with typical development timelines. Clarify that projects are not expected to be fully bid at application and set a reasonable standard for procurement documentation (e.g., narrative of approach, evidence of competitive intent, and preliminary cost estimates), without requiring completed bidding or construction-level documentation.

4. Development Team Capacity Requirement

While related to threshold requirements, this provision warrants separate attention due to its potential impact on statewide production. The draft appears to require that applicants have closed construction financing on all previously awarded Ceiling Credit developments before submitting a new application. As written, this functions as a strict threshold. In practice, LIHTC projects often take more than a year to close due to permitting, appeals, procurement, and financing coordination. This requirement would prevent developers from maintaining an annual pipeline.

In Vermont's development model-where a limited number of experienced developers partner with multiple nonprofit sponsors statewide-this would have broader impacts. A project in one community could be blocked by the status of an unrelated project elsewhere, effectively creating a statewide bottleneck tied to individual project timelines. If this is not the intent, the language should be clarified. If it is, it should be reconsidered to better balance capacity management with consistent production across regions.

Recommendation: Replace the blanket requirement with a targeted standard that evaluates pipeline capacity and performance (e.g., limits on open awards, evidence of substantial progress toward closing, or demonstrated track record), and clarify applicability to partnerships and affiliated entities.

5. Policy Inconsistencies

Several provisions create inconsistencies within the policy framework or with broader state housing and land use objectives:

- The absence of basis boost language creates uncertainty around a fundamental component of LIHTC project feasibility and may be an unintended omission.
- The lack of clear cost reasonableness standards (discussed in Section 2) may conflict with the eviction prevention threshold requirements, creating uncertainty around how operating costs for housing stability programs will be evaluated (discussed further below).
- Site challenge penalties may discourage infill, redevelopment, and brownfield sites despite smart growth priorities.
- Amenities/location requirements may conflict with supporting development in designated centers, particularly in smaller communities.
- Certain design and electrification requirements may outpace current technology readiness and supply chain constraints, conflicting with stated policy goals of increasing housing production and controlling costs.

These tensions risk outcomes that diverge from stated policy goals.

Recommendation: Ensure QAP criteria are consistent with state housing, land use, and climate policies and calibrated to current market and regulatory conditions.

6. Eviction Prevention and Operating Feasibility

We support the draft's emphasis on eviction prevention and housing stability. The concern is not the policy goal itself, but the lack of clarity around how the associated operating costs will be treated in underwriting. Effective eviction prevention requires ongoing staffing, coordination, and programming that entail real, recurring operating costs. For many nonprofit providers, these programs are partially funded through property operations. Without clear guidance, there is a risk that projects could be required to implement eviction prevention while simultaneously being

penalized through cost reasonableness review for the associated operating expenses. This creates a disconnect between policy intent and implementation, and may discourage or constrain robust housing stability efforts.

Recommendation: Explicitly recognize eviction prevention and resident services as appropriate and allowable operating expenses within underwriting standards, and ensure that cost reasonableness reviews do not penalize projects for maintaining effective housing stability programs.

7. Geographic Equity and Rural Impacts

Several provisions may unintentionally disadvantage rural communities and smaller-scale developments:

- Amenities and proximity requirements are more easily met in urban areas, limiting competitiveness in rural regions where need remains significant.
- The proposed developer fee structure may favor larger, urban projects that benefit from economies of scale, while making smaller rural developments less viable. Taken together, these provisions risk concentrating resources where projects are easiest to deliver, rather than where need is greatest, exacerbating regional disparities.

Recommendation: Evaluate geographic impacts and ensure a balanced distribution of resources across rural and urban communities. At a minimum, remove or modify the requirement that developments be located within two miles of a pharmacy, which poses a barrier even in larger towns and does not reflect current access patterns given the widespread availability of prescription delivery services.


[EXTERNAL]Comments on QAP Draft

From Chris Caldwell <ccaldwell@communitynationalbank.com>

Date Fri 2026-04-24 14:56

To DevelopmentDept <developmentdept@vhfa.org>

Cc Maura Collins <mcollins@vhfa.org>; g.seelig@vhcb.org <g.seelig@vhcb.org>; Kathleen Berk <kathleen@vsha.org>; kristin.mcclure@vermont.gov <kristin.mcclure@vermont.gov>; Alex Farrell <alex.farrell@vermont.gov>; Louise Bonvechio <LBonvechio@communitynationalbank.com>

 1 attachment (74 KB)

Qualified Action Plan.pdf;

Attached, please find attached our comments and questions on the draft OAP. We look forward to your comments and thoughts.

Thank you, in advance, for your consideration of our concerns.

Christopher Caldwell | President & CEO
Community National Bank
4811 US Route 5 | Newport VT 05855

802-487-3509 (office)
802-673-9323 (mobile)



Disclaimer

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To: VHFA Development Staff
From: Christopher Caldwell, President and CEO
Re: Comments on Qualified Action Plan (QAP) Draft - March 24, 2026
Date: April 24, 2026

Community National Bank appreciates the opportunity to provide feedback on the proposed Qualified Action Plan for 2027-2028. We are supportive of VHFA's mission and offer the following comments and questions for consideration.

Areas of concern include the following:

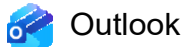
- **Proximity requirements.** Given the challenges inherent in Vermont's rural communities, the requirement that a full-service grocery store and pharmacy be located within two miles of a proposed project appears overly restrictive. While we understand and appreciate the underlying intent, this standard is likely to disqualify otherwise viable projects in rural areas where such amenities are not available within that radius.
- **Commercial lender commitment at application.** The requirement for a full commercial lending commitment at the time of application raises concerns. From our perspective, this approach may unintentionally centralize financing activities through VHFA and limit the ability of community banks to participate. Due to the number of variables that must be resolved later in the process, providing a full commitment at application is often impractical. In addition, reduced lender participation may make it more difficult to secure Affordable Housing Program (AHP) funding from the Federal Home Loan Bank and jeopardize support from Community Banks who often provide substantial capital as equity investors in these projects.
- **Increase in income targeting from 50% to 60% of AMI.** We would welcome additional explanation regarding the rationale for raising the income threshold. It is important to understand how this change aligns with the Plan's broader goal of ensuring access to affordable housing for those most in need.
- **Removal of the 30% competitive funding cap.** We are concerned about the elimination of the previous limit that prevented any single project from receiving more than 30% of competitive funds. This change may disproportionately disadvantage smaller projects, particularly in rural Vermont, and we would appreciate clarification on the intended policy outcome.

We are grateful for the opportunity to provide input and pose these questions. Community National Bank strongly supports affordable housing initiatives and values our longstanding partnerships with housing providers throughout our markets. We are concerned that certain proposed changes could significantly affect our collective ability to support the rural communities we proudly serve.

We appreciate your consideration of these comments and look forward to continued dialogue.

Sincerely,


Christopher Caldwell



[EXTERNAL]QAP Public Comment

From Cara <caramia802@protonmail.com>

Date Fri 2026-04-24 07:31

To DevelopmentDept <developmentdept@vhfa.org>

Cc Alex Farrell <alex.farrell@vermont.gov>; Maura Collins <mcollins@vhfa.org>; g.seelig@vhcb.org <g.seelig@vhcb.org>; Kathleen Berk <kathleen@vsha.org>; kristin.mcclure@vermont.gov <kristin.mcclure@vermont.gov>

 1 attachment (40 KB)

Cara Hansen SEP letter.pdf;

Dear VHFA and Joint Committee on Tax Credits,

Please see the attached letter as you consider public comment on the proposed changes to the OAP.

Thank you,
Cara Hansen

April 24, 2026

Vermont Housing Finance Agency
Development Department
164 St. Paul Street
Burlington, VT 05402

Dear VHFA Development Team,

I am writing to express my support for Vermont's shared equity program as a past program participant. I recognize the important role that the State Affordable Housing Tax Credit plays in supporting shared equity homeowners across Vermont, and I am grateful for VHFA's past support of the program. As VHFA drafts new program guidelines in the updated QAP, I ask that the Agency ensure that the changes continue to promote a strong and viable shared equity program so that this benefit continues to serve homeowners around Vermont far into the future.

After my partner and I split in 2019, I found myself struggling to find housing I could afford to rent for me and my children in Central Vermont. I signed a lease for a one-bedroom, ~650 square foot apartment for \$1250 a month, which put me on a tight budget as a newly single mother with two children. Luckily, there was a small room in the apartment where I was able to fit bunk beds for my son and daughter, but with their ages at eleven and nine respectively, I knew that rental wouldn't work well for us in the long-term. I reached out to Downstreet to apply for their shared equity program and, in less than six months, I was able to purchase a single-family home of my own that was nearly twice the size of the apartment I was renting, and it included three bedrooms, so my kids and I all had our own space. My monthly expenses for principal, interest, taxes and insurance totaled just over \$1000, which was nearly \$250 less than I was previously paying in rent, not to mention that every payment I made built equity in my purchase.

That home meant everything to me and my kids. It provided both financial and personal independence and stability that was exactly what I needed during one of the most challenging periods of my life. About six years later, when I was ready to move on and needed to sell my home, Downstreet already had qualified buyers who came to view the home just a few days after I signed the paperwork to sell. They loved it, and in less than a week from when it was officially made available for purchase, we had a signed purchase and sales agreement. The process was simple and smooth, and despite the limited equity I was entitled to through the program, I walked away with the principal from my mortgage and 25% of the earned equity, while the new homebuyers were able to purchase a great 3-bedroom home for well-under \$200,000.

Thank you for your support of this program and all of the affordable housing development efforts in Vermont. The shared equity homeownership program is a smart and effective way to promote affordable homeownership. In my opinion, it is a win-win-win scenario for the seller, homebuyer, and Vermont's affordable housing organizations. Having one's own safe, stable home is absolutely foundational to a healthy, productive and fulfilling life, and everyone, regardless of socio-economic status, deserves to live in an adequate home they can both afford and feel proud of.

Sincerely,

Cara Hansen

Former shared-equity homeowner

Re: DDI housing

From DevelopmentDept <developmentdept@vhfa.org>

Date Tue 4/28/2026 10:21 AM

To Carol Moriarty <Moriartycvt@comcast.net>

Hello Carol,

Thank you for taking the time to review the proposed Qualified Allocation Plan, and for your feedback and advocacy for your son and others in the community. Your comments have been received and will be reviewed by VHFA as we continue to develop the finalized plan.

Best,

Mia

Mia Watson (she/her)

Program Development Director

164 St. Paul St, Burlington VT, 05401 | 802.652.3453

[Vermont Housing Finance Agency](#)

vhf a Affordable homes for a sustainable Vermont

From: Carol Moriarty <Moriartycvt@comcast.net>

Sent: Friday, April 24, 2026 11:17 AM

To: DevelopmentDept <developmentdept@vhfa.org>

Subject: DDI housing

Vermont Housing Finance Agency,

We appreciate the opportunity to comment on the Qualified Allocation Plan.

Our son, Keegan has (Down Syndrome) an Intellectual and Developmental Disability (IDD), and will need stable service supported housing to live in when he can no longer live with us, his parents. The state immediately needs 602 units of this housing according to the VTDDC Housing Brief of 2023. We appreciate the support and additions made in past QAPs that help to create development of housing and while there is more development recently, we know you are aware that much more is needed.

Thank you for your consideration of our family need for housing.

Michael and Carol Moriarty

Woodstock, Vt

Recommendation:

A. We are requesting that the **new QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the priorities for awarding federal tax credits.** This will help with the development of service supported housing for our son and many others across the state. The QAP is a critical driver in housing policy. Developers receive extra points toward tax credits when they build new units that align with the priorities set forth by the OAP. People with disabilities are more likely to be poor, under or unemployed, and unhoused. As such, they represent a significant constituency within the community of people served by affordable housing organizations. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

B. Permit the creation of a rental subsidy fund for accessible unit

RECOMMENDATION

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If it is, it should be reconsidered to better balance capacity management with consistent production across regions.

Recommendation: Replace the blanket requirement with a targeted standard that evaluates pipeline capacity and performance (e.g., limits on open awards, evidence of substantial progress toward closing, or demonstrated track record), and clarify applicability to partnerships and affiliated entities.

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These tensions risk outcomes that diverge from stated policy goals.

Recommendation: Ensure QAP criteria are consistent with state housing, land use, and climate policies and calibrated to current market and regulatory conditions.

6. Eviction Prevention and Operating Feasibility

We support the draft's emphasis on eviction prevention and housing stability. The concern is not the policy goal itself, but the lack of clarity around how the associated operating costs will be treated in underwriting. Effective eviction prevention requires ongoing staffing, coordination, and programming that carry real and recurring operating costs. For many nonprofit providers, these programs are partially funded through property operations. Without clear guidance, there is a risk that projects could be required to implement eviction prevention while simultaneously being penalized through cost reasonableness review for the associated operating expenses. This creates a disconnect between policy intent and implementation, and may discourage or constrain robust housing stability efforts.

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7. Geographic Equity and Rural Impacts

Several provisions may unintentionally disadvantage rural communities and smaller-scale developments:

- Amenities and proximity requirements are more easily met in urban areas, limiting competitiveness in rural regions where need remains significant.

- The proposed developer fee structure may favor larger, urban projects that benefit from economies of scale, while making smaller rural developments. -_-'-_-'_-

CAM

Sent from my iPhone



Re: [EXTERNAL]HHAV QAP Comments

From DevelopmentDept <developmentdept@vhfa.org>

Date Tue 4/28/2026 12:07 PM

To Chad Simmons <csimmons@hhav.org>

Thanks Chad, received!

Mia

Mia Watson (she/her)

Program Development Director

164 St. Paul St, Burlington VT, 05401 | 802.652.3453

[Vermont Housing Finance Agency](#)

vhf a Affordable homes for a sustainable Vermont

From: Chad Simmons <csimmons@hhav.org>

Sent: Friday, April 24, 2026 4:30 PM

To: DevelopmentDept <developmentdept@vhfa.org>

Cc: Chad Simmons <csimmons@hhav.org>

Subject: [EXTERNAL]HHAV QAP Comments

Hello friends! Please find attached HHAV's QAP comments.

Cheers!

Chad

Chad Simmons, Executive Director

Housing & Homelessness Alliance of Vermont (HHAV)

csimmons@hhav.org

802.451.8627 (voice/text)

hhav.org



Date: April 24, 2026

Re: Draft 2027-2028 Qualified Action Plan Public Comments

To: Vermont Housing Finance Agency

From: Chad Simmons, Executive Director, Housing & Homelessness Alliance of Vermont (HHAV)

Thank you for the opportunity to provide comments on the draft 2027-2028 Qualified Allocation Plan (QAP). This is a critical housing policy document and we appreciate the chance for a broad array of stakeholders to provide insights, expertise and constructive suggestions.

HHAV is a diverse coalition of more than 60 organizational members collectively working to build a Vermont where the fundamental right to housing is enjoyed by all.

Amongst our policy goals, we seek to maximize public investment in housing and services to benefit those who are most vulnerable to homelessness and housing insecurity, which includes those with the lowest incomes, and those historically and continue to be excluded from accessing housing. We understand this is done within the context of a complex and dynamic housing market, and as such, we see the QAP as an important guide to prioritize state and federal resources that benefit the people most impacted by homelessness and housing insecurity.

To provide some context and grounding, here are several principles that ground our comments on the draft QAP:

- We support thoughtful land use and planning to promote multiple priorities to achieve housing targets, including smart growth, energy efficiency and brownfield clean up.
- We support housing access that is not contingent on readiness, employment or participation in treatment or services. HHAV also sees that services to help people find and keep housing are essential.
- We believe that public dollars should deliver lasting public benefit, and we support housing investments that are permanently affordable for Vermonters with limited incomes.



- We seek to engage our members and people with lived experience and expertise in shaping housing policy to make families and communities stronger. We understand the work of equity and justice requires attention to how resources are allocated, how policies and systems are designed, and access to the process of decision-making.

With these in mind, we offer several comments, questions and suggestions to consider as the agency creates the next draft. All of these reflect member input over the last several weeks and numerous conversations with members and partners from across the state.

Draft Review/Comment Process & Timeline

- Thank you for providing key updates and responses on [VHFA's QAP page](#). These responses regarding pre-application opportunities, state designation program integration and basis boost for non-profit set aside answer several questions/comments that members shared.
- Also related to VHFA's QAP page, would VHFA be willing to share a summary of the goals trying to be achieved by the proposed changes reflected in the draft QAP? Previous iterations of this page had previous drafts, summary of comments/responses, and (critically important), presentations reviewing the proposed changes and rationale for the proposed changes. This context and materials were extremely helpful in understanding the thinking and underlying goals of the proposed QAP changes.
- Would VHFA consider including an opportunity to review/add comment to a second draft? We feel having another opportunity to review a final draft would benefit the state and interested stakeholders to align with broad statewide housing goals.
- Would VHFA consider phasing in some of these changes over multiple QAP cycles? Overall, members shared that this draft reflects significant changes and upends processes and funding cycles. If we were to temper the changes and instead, phase them in over 2-3 years, this would allow for a soft landing and give other funders and developers time to align.



Application & Award Process

- We ask that more than 30 days be given from time of materials being posted to the submission deadline.

Threshold & Evaluation Criteria

- We welcome and encourage ongoing efforts to address costs and make affordable housing development more efficient. It is clear VHFA put a focus on these important components to housing development.
- We encourage the next draft to balance the goal of encouraging and allocating awards to projects that promote density, with the flexibility to develop in rural, less populated areas of the state. One of the most effective aspects Vermont's tax credit priorities, is ensuring geographic equity.
- We encourage continued prioritization in transformative housing development that balances housing development costs, with investing in developments that meet multiple state goals including access to services and community, brownfield redevelopment and economic impact
- HHAV supports prioritizing projects that reach those with the lowest income, especially as it relates to housing those exiting homelessness. We also recognize that not all projects will be able to feasibly include a higher percentage of households at the lowest income levels. We encourage a balanced approach, ensuring services are provided and built into proposals for those most in need with the goal of mixed-income development, ensuring long-term financial success.
- We encourage the use of cost per square foot as a metric in housing costs criteria. This allows a more apples-to-apples comparison when looking at costs criteria, acknowledging some larger units are needed in some projects and some may need smaller units.

