



August 8, 2024

Dear VHFA Development staff,

Thank you for the opportunity to provide comments as you consider changes to the Qualified Application Plan for the 2026 program year. We very much appreciate VHFA's interest in developers' experience and opinions, and the thoughtful conversation during the public meeting.

In response to some of the direct questions asked in the public meeting led by VHFA, we offer these responses:

- **Location** – Over recent decades it has been invaluable for the QAP to incentive projects located in smart-growth areas to support state goals and to ensure that residents of subsidized housing are well served by amenities and transportation. Now, the state is moving away from state designated areas for permitting jurisdiction in recognition of duplicative permitting jurisdictions and the costs and risks some permitting processes place on development projects, and the associated impacts on housing scarcity. In most Vermont counties, state designated areas generally describe areas served by municipal water and sewer, town designated areas for growth, and smart-growth locations. However, in Chittenden County, many locations not located in a designated area are excellent development sites, such as already developed sites in need of redevelopment, and sites within private developer master plans. This is the opportunity for the QAP's evaluation criteria to reflect state changes to designations and approach to targeting development areas that do not exclude good locations from potential development.
- **Housing for homeless** – If "tax credit units" is more clearly defined in the 2026 QAP as units restricted to <60% of Area Median Income (<80% units in AIT projects are not included in this number) we feel the current incentive for projects designating 25% of tax credit units for households exiting homeless continues to be appropriate and should remain an evaluation criterion. Vermont is experiencing a homelessness crisis and 9% tax credits are the primary resource we have as a state to address this emergency situation.
- **Permanent debt** – The scoring criteria introduced in the 2022-2023 QAP of a target percentage of permanent debt disadvantages Chittenden County projects. Criteria such as Deeper Affordability are important project differentiators and help to address Vermont's neediest residents. While sponsors work to incorporate <30% and <50% units into projects they simultaneously work to secure project based rental assistance. VHFA has asked sponsors to underwrite using a lower number of project-based vouchers than the project will likely secure, and that the Deeper Affordability criteria require. Modeling projects with lower

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project-based vouchers does not allow them to reach 18% permanent debt in today's construction cost and interest rate environment. Sponsors seek to maximize permanent debt while also striving to target deep affordability and to secure sufficient sources to finance a project. We suggest that if a permanent debt percentage criteria continues in the QAP that the target percentage for Chittenden County projects is lowered.

- Deconcentration – We suggest that the Consolidated Plan govern state policy regarding addressing the homelessness crisis. The QAP does not need to have a direct role but there should be a more robust conversation, with input from human service agencies and providers as well as housers.
- Instead of a threshold, a sponsor's current portfolio meeting 15% designated homeless units should be a checkmark. Since the Executive Order requiring 15%, many projects working towards this current threshold receive waivers. Instead it seems that sponsors "working towards" this threshold should be the threshold, and those sponsors meeting this directive should receive a checkmark.
- Appraisal – The timing of pre-closing appraisals does not line up with site control and purchase and sale negotiations earlier in project development.
- Eventual tenant ownership – We recommend keeping this point. Providing low-income residents with more control over their housing is a positive, if often difficult to obtain, goal. There could be opportunities for single-family developments that include modular housing that could be converted to shared-equity ownership. There could also be opportunities for co-op ownership as had been previously proposed at Windy Ridge in Hinesburg. The code is silent on the issue of equity and we would argue that resident control and financial gain from reduced rent are significant benefits that make this point worth keeping.
- Developer fees – The cash fee has been capped at \$1 million for many years. We would request that the cap be raised to \$1.2 million to reflect overall cost inflation and the higher risk of projects.

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

Sincerely,



Amy Demetrowitz
Chief Operating Officer

To: VHFA Development Staff
From: Cindy Reid, Cathedral Square
Re: Feedback on 2026-2027 QAP
Date: 8/6/2024

We appreciate the opportunity to provide our thoughts on the Qualified Allocation Plan (QAP) as you begin to work on a 2026-2027 QAP.

Cathedral Square (CS) has been a significant user of the Housing Credit program to advance its mission, *Advancing Health Homes, Caring Communities and Positive Aging*. CS serves a very low income population and SASH® services are available to all residents, creating homes where people age in place and thrive. In CSC's rental housing portfolio of 1,009 units, most of our households are very low income and receive some form of rent subsidy or another form of discounted rent. Our average SASH participant has 7.6 chronic conditions and lives in independent housing with SASH support, delaying unnecessary and premature moves to higher level facilities. This data illustrates the impact of the health and housing model, a model which the Housing Credit program has played a critical role in funding.

The Housing Credit program is the largest funding source for affordable housing, including affordable housing for older adults, Vermont's fastest growing demographic. We offer this feedback as you begin work on the draft 2026-2027 QAP through the lens of creating service-enriched healthy homes that are perpetually affordable, where residents can thrive in their communities.

Credit Cap for Age Specific Housing

We strongly urge you to remove the 30% cap on age specific housing projects seeking Ceiling Credits. Given the demographic changes in Vermont, specifically the growing population of older adults and their need for appropriate housing with services to remain in their communities, we need more age specific housing. When we create new age-specific housing for older adults to move into, both single family homes and apartments are freed up for younger individuals and families. This is a win-win. Funding one, or sometimes no senior projects per year is not enough to meet the growing need. Maintaining a cap is detrimental to serving the housing needs of older adults and is not an equitable policy.

Project Tenancy (Section 4.2 in Current QAP)

We strongly urge you to remove the distinction between general occupancy and age specific housing, and simply provide checkmarks for any project that is service-enriched, and none for those that are not service-enriched. Otherwise, age specific housing has two significant structural challenges to overcome - the 30% cap, and getting fewer points than general occupancy housing.

Permanent Debt

We do not think projects should be ranked by how much debt they can carry. This is an underwriting issue, not a scoring issue. We recommend removing this criterion.

While we understand the rationale behind incenting permanent debt (more debt means using less scarce resource), without addressing the “depth of affordability” there is a significant difference between types of projects funded and what is expected of each. There are projects which apply for tax credits having maximum 60% rents and can therefore afford more debt.

And there are projects that come in with rents below LIHTC 60% maximum rents, and rents at 50% AMI, which provide greater affordability to residents (this is the model we use). These kinds of projects can afford less debt, but better serve very low-income persons, and have limited cash flow which typically stays with the project.

Then there is the question of interest rates and affordable loan products – we applaud VHFA’s work to offer more affordable rates and loan products, and hope those programs continue to expand. However, until there is greater access to lower cost debt financing, having dual goals of addressing homelessness while taking on permanent debt is problematic, especially in an environment with limited access to rental assistance and service funding which is typically not multi-year stable funding.

Passive House or Net Zero

We encourage you to remove “certified to” under Passive House, and have it be “designed and constructed to” instead. Certifications are costly and do not necessarily add value. The value is in the building envelope and systems. Preferably, projects that exceed Efficiency Vermont’s High Performance Standard should get this checkmark. This would be more practical and cost effective and have a similar goal, in creating high performance buildings.

Thank you again for the opportunity to contribute our thoughts on the QAP. We will look for the draft 2026-2027 QAP to review and respond to.

From: Zeke Davisson <ZDavisson@summitpmg.com>
Sent: Tuesday, August 13, 2024 4:12 PM
To: DevelopmentDept
Cc: Tom Getz; Andy Miller; Seth Leonard; Megan Roush
Subject: [EXTERNAL]QAP Comment

Hi all,

We are looking forward to more robust comment once a draft has been prepared, but wanted to flag one important issue at this stage for your consideration.

Now is the time to incorporate cost reasonableness into scoring. Because the Vermont QAP only incentivizes policy priorities that increase cost, we have far exceeded our neighbor states in TDC/unit. Incentivizing cost control would refocus the development community on an efficient delivery of net new units.

It is worth noting that Vermont is one of the only—if not the only—state that doesn't score or have a threshold on cost in its QAP, but we do have one of the least efficient credits/unit ratio, one of the highest cost/unit ratio, and, as we've all discussed quite extensively, one of the most acute housing crises in the country. As we enter a post-ARPA, post-inflationary construction reality, the time to incorporate cost considerations seems appropriate.

Considering cost is consistent with NCHSA's Recommended Practices in Housing Credit Administration 2023 Update, recommending that "each Allocating Agency should develop a standard for limiting development costs to reasonable amounts" to prevent the congressional and public support being "imperiled by developments, however meritorious, the cost of which exceeds an accepted standard of reasonableness". (Recommendation #13, pgs. 16-18)

Look forward to more discussion during this process, thank you all for leadership on this.

Zeke



Zeke Davisson (he/him) | COO
phone: 802.846.5430 x3101
site: summitpmg.com

QAP Revision Comments on the Current Qualified Allocation Plan
Kathy Beyer and Jess Neubelt
August 13, 2024

Location

- We encourage treating dense infill locations connected to town water and sewer similarly to New Town Centers – as worthy of three checkmarks.
- Proximity to amenities is an interesting consideration but has similar challenges to transportation. The smaller towns have fewer specific amenities or buildable locations within walkable proximity to those locations. Additionally, state designated centers are a longstanding, cross-cutting state policy approach that have worked well to concentrate state spending in locations with infrastructure and a wide variety of resources.

Housing for Homeless

- Underwriting to 15% of units with PBVs at time of application is not aligned with the need to meet a 25% homeless designation level to be competitive for 9% awards. While projects working with Burlington Housing Authority are generally able to provide a commitment letter at the time of application, projects relying on a commitment from VSHA are not able to provide such a letter until much closer to closing. We do need the ability to underwrite full PBVs for those units, otherwise this point is not equally available to all regions of the state.
- We would like more time to consider the impacts of other changes to these criteria and would expect to provide specific feedback once proposed changes are in hand.

Housing Retention

- We'd like more time to convene a conversation with property management, asset management, and VHFA to consider any changes to housing retention approaches.

Costs

- We believe that VHFA's current practices of identify project TDCs and per unit or per square foot costs are adequate. It allows reviewers of the 9% memo an opportunity to compare projects generally, without trying to create an apples-to-apples comparison that is so challenging given the spectrum of project types and small pool of projects across Vermont in a given year.
- The desire to incentivize lower development costs is in conflict with the locational incentives for building in downtowns and tight infill sites.

Timing

- The biggest challenge of allocation timelines is the level of investment required to get to an award. While there are certainly benefits to the state of allocating later in the process, when timelines are more certain, that requires developers to take on much more financial risk without certainty of a project's path forward. In particular, we strongly discourage making state permits a threshold

requirement for application. Obtaining state permits effectively requires completing Design Development, which means a significant outlay of money prior to award. Furthermore, it starts the permit expiration clock; if a project were not funded and its permits expired, having to pursue re-issued permits would re-open appeals periods.

Age-Restricted Housing

- The 2020 Housing Needs Assessment shows that the unmet need for affordable rental housing continues to be higher for non-senior households in comparison to senior households. The report also notes that nearly 50% of income eligible senior renter households are living in subsidized rental housing, relative to 30% among non-senior households. We believe the current framework is appropriate.
- We would appreciate the opportunity to review and comment on any updates to the Universal Design checklist prior to its formalization and publication.

Energy and Emissions Reductions

- We do not support VHFA requiring electric domestic hot water, which is currently not broadly achievable for MF housing. Heat pump hot water heaters require large spaces to draw waste heat from in order to operate, and in the limited instances where we have designed for them, the implementation has proved a challenge. Alternatively, geothermal DHW systems are an option, but at a significant cost premium.
- We do not believe that the cost of green building certifications bring equivalent value to a MF building. The 2024 Energy Code and Efficiency Vermont's High Performance Track, updated this year to align with the new energy code, already require highly energy efficient buildings. Vermont's energy code is updated every three years with the goal of all new construction being net zero by 2030. We encourage VHFA to continue to participate in the energy code updates, and in particular, to engage in the definition of a net zero MF building, which has not been clearly articulated by the VT PSD.

Racial Equity and Social Justice

- We generally do not support set-asides.
- We do support VHFA's efforts in building a pipeline of BIPOC development professionals.

Eventual Tenant Ownership

- As with checkmarks for Passive House, we believe these projects are challenging, unique, rare, and therefore worthy of a checkmark but not likely to become a significant part of the application pool.

Mixed-Income and the AIT

- We support eliminating "market rate" from the definition of mixed-income properties, and instead focusing on whether a project includes units above 60% AMI, regardless of whether they generate basis. This allows developers to leverage AIT's largest benefit – 100% applicable fractions – without creating an administrative burden for VHFA while also recognizing that most "market rate units"

being developed under the former and existing QAPs were in fact income- and rent-restricted below market by VHCB and other funds.

Broadband/ Internet Access –

- We believe projects would universally score well if a checkmark were given for broadband infrastructure, especially since HOME already requires such broadband infrastructure and delivering internet infrastructure to all units is standard practice at this time. We do not believe it is needed to move the market.

Format

- We are neutral about the QAP being separated from the rest of the LIHTC manual, so long as updates to the LIHTC manual are clearly communicated in a similar fashion to QAP updates.

Additional Topics for Consideration:

Perm Debt

- In general, we think this checkmark works against having adequate operating budgets. In particular, permanent debt reduces the capacity to financially support ample supportive services. This is one of the few line items in a budget not explicitly dictated by third-party providers and therefore is one of the few levers we have in our operating budgets to shift as permanent debt needs change. By reducing pressure to carry higher debt for the purpose of securing checkmarks, we'll reduce pressure to underfund supportive services.
- In light of recent increases in property taxes and insurance, the 18% debt checkmark for Chittenden County is very challenging.

Appraisals supporting the purchase price.

- We support reconsidering appraisal standards that require an updated “as-is” appraisal prior to closing, such that it is acceptable to update the original appraisal as opposed to having the construction lender’s appraiser provide an “as is” value... This would ensure that updated information is available, but that a consistent evaluation approach is utilized, leading to fewer surprises as the project nears a construction loan closing.

Development Fees

- Given the increase in project cost, complexity and timelines, we advocate for raising the cap on payable fee to be the same for 9% projects as it is for 4% projects (\$1.5M). While we seldom come close to the overall development fee cap (12% - 15% of TDC), we are increasingly encountering the payable cap, which then requires deferring any additional fee to be paid out of cashflow. Because deferred fee must be paid down within 10 years in order to be LIHTC basis-eligible and therefore generate credits and equity, cashflow that could otherwise be utilized to pay debt service is instead required to be protected in order to pay down the deferred fee.



**STATE OF VERMONT
HOUSE OF REPRESENTATIVES
115 STATE STREET
MONTPELIER, VT
05633-5201**

To: VHFA Development Staff

From: Representative Daniel Noyes - Lamoille-2
Senator Richard Westman - Lamoille

Re: Feedback on 2026-2027 QAP Date: 8/6/2024

Thank you for the opportunity to provide feedback and for considering our input on the Qualified Allocation Plan (QAP).

Lamoille County is a great place to grow old, with access to outdoor recreational activities that range from the Lamoille Valley Rail Trail to world class ski areas. We have a critical access hospital, primary care providers, and many other health and wellness support services available to older Vermonters. Our county's population over the age of 65 is growing at a faster rate than the rest of Vermont and a majority of northern New England. In 2010, individuals aged 65 years or more accounted for 12 percent of the population. That grew to 19 percent in 2022. Lamoille County's population over 65 years of age increased by 2,012 individuals between 2010 and 2022 according to the 2024 Lamoille Housing Needs Assessment. Lamoille County is missing adequate access to affordable housing for older Vermonters.

Thirty percent of the housing stock in Lamoille County is occupied by individuals over the age of 65 and 82 percent own their own home. There is potential for a significant turnover of single family homes in the region, but only if there is affordable age-specific housing. According to "Age Strong Vermont," our 10 year multi-sector plan on aging, there needs to be considerable investment in age-specific housing across Vermont. This is especially true in rural areas like Lamoille County. The Age Strong VT plan sets an overall statewide goal of 5,000 new units of high-quality affordable housing to enable residents to age well in the community, and 3,750 age-specific housing units available for older Vermonters.

Older Vermonters will not leave their homes if there is no place to go. Younger Vermonters can not transition from the rental market to home ownership if there are no affordable homes available on the market. A solution is to provide housing options to older Vermonters in rural communities with affordable housing where they currently live, where their families live, where their friends live, and where they want to live. If we do this it will open existing housing to the next generation. However, rural communities can not do this without investment and policies that promote the development of age-specific housing.

We recommend that you remove the 30 percent cap on age-specific housing projects seeking Ceiling Credits. In fact, we recommend developing a system that promotes and prioritizes age-specific housing, especially in rural communities and village centers where access to transportation and services are more accessible. This will open housing stock and allow younger Vermonters to start building wealth through homeownership.

Addressing the housing needs of older Vermonters in rural areas will never have the economy of scale as it does in urban areas. Many rural communities do not have water and wastewater, and require fewer units, all at a greater expense than larger developments in urban areas. We ask that you do not rank projects by how much debt they can carry, as this is an underwriting issue, not a scoring issue. Twenty percent of Lamoille County's residents over 65 years of age will have incomes less than \$35,000 in 2028. Developers can not afford to carry debt and prioritize affordable housing for low income Vermonters. We recommend that you remove this criteria.

We recommend that you remove the distinction between general occupancy and age-specific housing projects in Section 4.2 under the current QAP. Caping age-specific housing at 30 percent and distinguishing between general occupancy and age-specific housing will delay investments needed in rural communities to address the housing shortage. Perhaps developing a system that rewards developers who invest in both age-specific housing, as well as service-enriched housing, would provide a better strategy to begin to alleviate the housing needs of rural Vermonters.





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Agency of Human Services

MEMORANDUM

TO: VHFA Development Team

FROM: Jill Bowen, PhD, Commissioner, DAIL 
 Mark A. Levine, MD, Commissioner, VDH 

DATE: August 13, 2024

RE: Comments regarding 2026-2027 Qualified Allocation Plan

We appreciate the opportunity to provide comments as you begin to assemble a draft 2026-2027 Qualified Allocation Plan (QAP).

DAIL's mission is to make Vermont the best place to grow old or live with a disability – with dignity, respect and independence. Because housing is key to healthy living and aging, we are invested in seeing more affordable and accessible housing developed in Vermont for all those in need, especially older Vermonters and Vermonters with disabilities.

Vermont has one of the oldest populations in the country, with approximately 200,000 Vermonters now over the age of 60. To address our changing demographics with vision and intention, the [Age Strong VT Multisector Plan on Aging](#) was launched in early 2024. This 10-year plan calls on the government, in collaboration with state and community partners, to build an age-friendly state. This includes three key housing objectives:

1. Increase the number of new units of high-quality affordable housing that enable residents to age well in community. (Goal: 5,000 new units)
2. Increase age-specific housing available for older Vermonters. (Goal: 3,750 new units)
3. Increase the number of older Vermonters who can “age in place” in their community.

Given Vermont's aging demographic and the long waiting lists that exist for affordable age-specific housing, we strongly urge you to adjust the cap imposed on age-specific housing projects seeking Ceiling Credits. Maintaining a cap of 30% that effectively limits the development of housing for older adults to one project a year is detrimental to meeting the housing challenges of this vulnerable and growing population. Tax credits are the largest single source of funding for affordable housing in Vermont, and age-specific housing should have equal access to this resource.

The benefits of increasing age-specific housing support all Vermonters directly or indirectly:

- Age-specific housing provides older Vermonters with housing that includes more supportive services for aging in place and aging in good health. This is critical given the net closure of 21 residential care homes across the state in the last 7 years at a time when the need for service-enriched housing is growing.
- When older Vermonters have access to age-specific housing, they are more likely to downsize from their single-family homes, freeing up key housing stock for Vermont families. (See '[Aging Vermonters Who Can't Find Housing Are Part of the State's Real Estate Gridlock](#)', *Seven Days*, 2022)
- When older Vermonters move from general occupancy housing to age-specific housing, if that is their preference, it frees up general occupancy housing for others.

Additionally, we recommend changing the Evaluation Criterion "Project Tenancy" to remove the distinction between general occupancy and senior housing, and simply provide checkmarks for any project that is service-enriched, and none for those that are not service-enriched. Otherwise, age-specific housing has two significant challenges to overcome (the cap and being ranked lower than general occupancy). Given the severity of the State's overall housing needs, and the growing housing needs of older adults, we believe this change would be a fair and balanced approach to evaluating projects.

Finally, we recommend supporting housing "set-a-sides" to support permanent supportive housing opportunities for individuals with intellectual and developmental disabilities. A recent housing report, *Service Supported Housing for Vermonters with Intellectual and Developmental Disabilities—2023 Research Brief*, commissioned by the Vermont Developmental Disabilities Council and Green Mountain Self-Advocates indicated that Vermonters with developmental disabilities would benefit from over 600 such units across the state. Permanent supportive housing allows individuals with all levels of support needs to reside within the community of their choosing.

Thank you for considering these comments in your planning efforts. Please do not hesitate to reach out to DAIL or to VDH if we can be of assistance through this process.



August 13, 2024

VHFA Development Team
164 Saint Paul Street
Burlington, VT 05401

Re: Comments regarding 2026-2027 Qualified Allocation Plan

To whom it may concern:

Thank you for the opportunity to provide comments regarding 2026-2027 Qualified Allocation Plan (QAP) draft.

Meals on Wheels programs across the state continue to see an increased need for home delivered meals as our population ages. These providers are typically small organizations that rely on volunteers to make sure older Vermonters have access to nutrition and a daily check in. We see the need for access to affordable housing for older Vermonters, especially in the rural parts of our state where age-specific housing is virtually non-existent. To address this growing need we ask you to consider removing the 30% cap on age-specific housing projects seeking Ceiling Credits. This cap limits development in village centers and down towns where older Vermonters can access services and supports to continue to live in their communities. These tax credits are especially essential in rural areas to overcome the costs of affordable development where infrastructure is limited or non-existent.

With the increased need for housing for older Vermonters we ask that you reassess the "Project Tenancy" Evaluation Criterion and possibly eliminate the distinction between general occupancy and age-specific housing. We understand that Vermont's housing needs span all age groups, in all corners of our state, but we do not see the need to rank age-specific housing lower than general occupancy. Actually the increased needs of an aging population merit increasing access to service-enriched housing, perhaps look at ways to encourage this type of development.

In Service,

Director
Vermont Association of Senior Centers and Meal Providers
P.O. Box 128, Lake Elmore VT 05657

To: VHFA Development Team

From: Kelly Stoddard Poor, Associate State Director, AARP Vermont

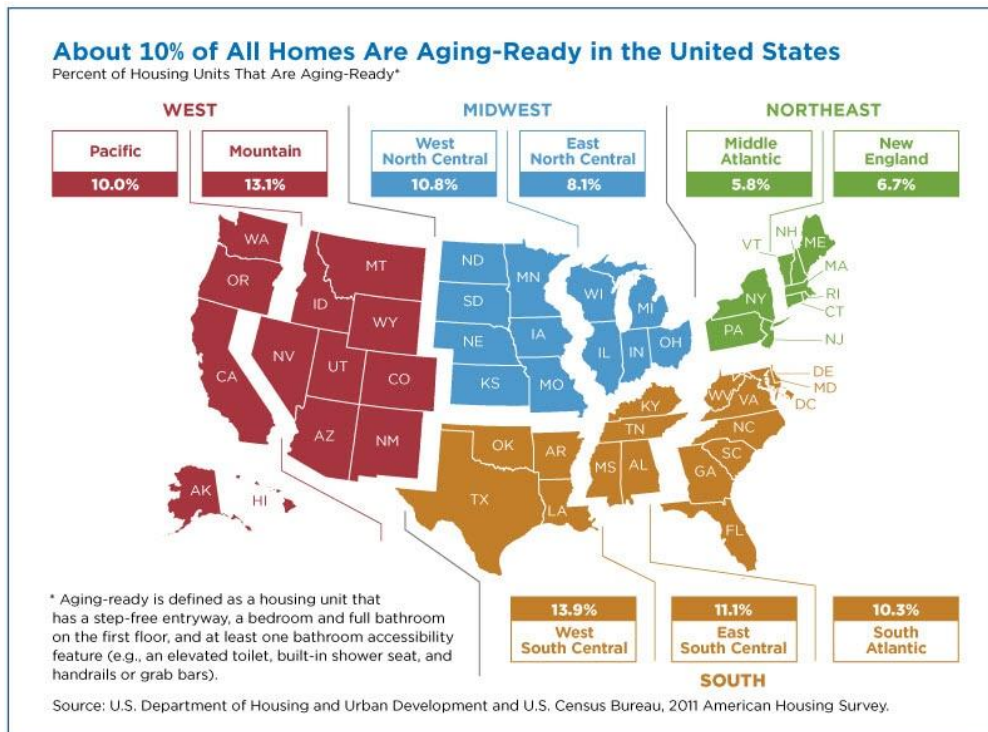
Re: Comments regarding 2026-2027 Qualified Allocation Plan

Date: July 26, 2024

On behalf of AARP Vermont, we appreciate the opportunity to provide comments as you begin to assemble a draft 2026-2027 Qualified Allocation Plan (QAP).

The population of older adults is getting larger and older rapidly. Given Vermont's aging demographic, we strongly urge you to remove the 30% cap imposed on age-specific housing projects seeking Ceiling Credits. Maintaining a cap to limit the development of housing for older adults is detrimental to meeting the housing challenges of this growing demographic. Tax credits are the largest single source of funding for affordable housing in Vermont, and age-specific housing should have equal access to this resource.

As our nation rapidly ages our state finds itself unprepared to meet the growing housing needs among older adults. Vermont's aging housing stock is not suitable for the increased need for accessibility and proximity to services and amenities. According to the U.S. Census, of the nation's 115 million housing units, only 10% are ready to accommodate older populations, which is significantly lower in New England. See below.



It is critical that we increase investments for age-specific housing as the current housing supply will not keep pace with the accelerated need among older adults to live in universally designed, accessible housing with home and health services, which is what age-specific housing can provide them.

Second, we recommend changing the Evaluation Criterion “Project Tenancy” to remove the distinction between general occupancy and senior housing, and simply provide checkmarks for any project that is service-enriched, and none for those that are not service-enriched. Otherwise, age-specific housing has two significant challenges to overcome (the cap and being ranked lower than general occupancy). Given the severity of the State’s overall housing needs, and the growing housing needs of older adults, we do not think it is fair or appropriate that age-specific housing is ranked lower than that of general occupancy.

We will remain engaged as the QAP is developed and appreciate your consideration of our feedback on this important public policy document.



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August 6, 2024

Olivia LeVecchia
Vermont Housing Finance Agency
164 Saint Paul St,
Burlington, VT, 05401

Dear Olivia,

Thank you for the opportunity to provide comments for the 2026-2027 Vermont Housing Finance Agency (VHFA) Qualified Allocation Plan (QAP). Fairview Housing Partners is a mission-driven non-profit affordable housing owner, developer, resident service provider and advocate for the stewardship and expansion of affordable housing resources around the country. While we have not yet developed any affordable housing in Vermont, we are actively developing or preserving affordable housing communities in Arizona, Florida, Illinois, Montana, North Carolina, Utah, and Virginia. We also implement third-party resident service programming initiatives in additional states and engage in affordable housing educational and advocacy initiatives across the country.

Basis Maximization Strategies

By adopting strategies that maximize the eligible basis in bond finance deals, VHFA facilitates developers' ability to raise additional tax credit equity. This can particularly be impactful on 4% LIHTC transactions because the LIHTC in these transactions are not a competitive resource but rather come "as of right" if the project meets threshold requirements. There are two areas we recommend VHFA consider revising in its 2026-27 QAP to drive additional production through its bond program relating to developer fee amounts and the ability to defer developer fee.

From a practical perspective, increasing developer fees in a rising cost environment, as we are experiencing today, generates additional eligible basis and additional tax credit equity. This can be particularly impactful on 4% bond transactions where the LIHTCs are capped by eligible basis rather than an annual state ceiling. Maximizing developer fees, within the constraints of the tax law, regulation, and reasonable underwriting, is a proven and successful method of generating additional LIHTC eligible basis, and in turn, equity proceeds which help fill project gaps and/or reduce the need to obtain state gap financing resources. We defer a substantial portion of our developer fees to fill project gaps. One way to frame our proposal of increasing developer fees in a rising cost environment is that the additional fee effectively will serve as additional construction contingency, much drawn on today as construction costs skyrocket.

For additional context, we believe it is important to acknowledge the role developer fees play in affordable housing transactions as well when you consider the appropriate fee setting



mechanism. The IRS permits the inclusion of developer fees in eligible basis because these fees serve as the primary form of compensation for LIHTC developers. They pay for overhead of essential functions, including accounting, human resources, information technology, asset management, insurance and legal fees and many others. Developer fees also serve as the primary form of reimbursement for pre-development costs and resident services.

Recommendation - Developer Fee Amount: We suggest revising the developer fee ceiling for all 4% LIHTC tax exempt bond-financed transactions to a flat 18-20% of adjusted basis. We note as a percentage this is only a modest increase for new construction projects from the current policy. The change as proposed would be particularly impactful for preservation properties, which are particularly challenging to finance in Alaska given the small development size in the state's current affordable portfolio and as such benefit less from economies of scale.

By doing so, VHFA would align more closely with your peer agencies, including Tennessee (25%), Ohio (20%), Kentucky (20%), North Dakota (20%), Arizona (19%), Florida (18%), Iowa (18%), West Virginia (18%) and Oklahoma (20%), and increase the attractiveness of bond financed LIHTC transactions in the state. Should AHFC adopt this recommendation, we further recommend that all developer fees above 15% (the current ceiling) be deferred. I have included in Appendix 1 additional data illustrating the impact of unit production upon the adoption of this strategy in Tennessee.

Operating Reserve Policies

To provide developers with more working capital flexibility, we urge VHFA to consider amending its Operating Reserve policy to allow a surety bond as an alternative to a funded operating reserve. Such a surety bond should meet stringent requirements including being backed by a S&P A rated / AM. Best Rated A++ XV Surety Company *and* be written in a way where it is "as good as cash" so that a syndicator/investor can request to have the reserve funded at any given time for any given reason.

In effect, developers would still need to have the ability and balance sheet in place to fund the reserve at any time during the compliance period but would have the flexibility to invest funds in higher yielding accounts such as certificates of deposit, treasuries, or other higher yielding investments.

We note that housing finance agencies in Minnesota, Iowa, North Dakota, and Montana all specifically reference in their QAPs and related documents that a bond is an acceptable alternative to cash in funding operating reserves. Additionally, Mississippi, Iowa and Oklahoma specifically accept Letters of Credit as an acceptable alternative to cash in funding operating reserves. We can provide contacts of reputable surety bond companies to the agency who can



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explain the current options in the market and answer technical questions regarding their structures, “good as cash” requirements and market pricing.

Conclusion

Thank you for the opportunity to provide this feedback as you develop the 2026-27 QAP draft. If you have any questions regarding this feedback I would be happy to connect further at tamdur@fairviewhousingpartners.org or 914.241.5885.

Sincerely,

Thom Amdur
Executive Director

About Fairview Housing Partners

Fairview Housing Partners is a non-profit affordable housing organization dedicated to expanding access to quality, affordable homes in communities where they are needed most. Our activities including include real estate development, facilitating capital investments to develop or preserve affordable housing, the provision of resident servicer and supply focused policy advocacy.



Vermont
Association of
Area Agencies
on Aging

27 Main Street, Suite 14,
Montpelier, VT 05602
info@vermont4a.org
(802)225-6210

www.Vermont4A.org

Member Agencies:

Age Well
Central Vermont Council on Aging
Northeast Kingdom Council on Aging
Southwestern Vermont Council on Aging
Senior Solutions

To: Vermont Housing Finance Agency (VHFA) Development Team
From: Mary Hayden, Executive Director, Vermont Association of Area Agencies on Aging (V4A)
maryh@vermont4a.org
Re: Comments Regarding 2026-2027 Qualified Allocation Plan (QAP)
Date: August 8, 2024

V4A appreciates the opportunity to submit comments as you begin to assemble the draft 2026-2027 Qualified Allocation Plan (QAP).

V4A represents Vermont's five Area Agencies on Aging (AAAs), providing a range of services designed to support older Vermonters to live with dignity in the home or setting of their choice.

AAAs observe that many older Vermonters struggle to maintain their single-family homes and are waiting years to move into suitable age-specific rental housing. Given Vermont's aging demographic, we strongly urge you to remove the 30% cap imposed on age-specific housing projects seeking Ceiling Credits from the 2026-2027 QAP.

V4A also recommends removing the distinction between general occupancy and senior housing from the Evaluation Criterion, "Project Tenancy," and suggests adding checkmarks for any project that is service-enriched, and none for those that are not service-enriched. Otherwise, age-specific housing has two significant challenges to overcome (the cap and being ranked lower than general occupancy). Given the severity of the State's overall housing needs, and the growing housing needs of older adults, we do not think it is fair or appropriate that age-specific housing is ranked lower than that of general occupancy.

Removing these two challenges to age-specific housing from the QAP is consistent with Vermont's multi-sector plan on aging, ***Age Strong VT***, our state's road map to healthy aging as adopted by the Governor and launched in February 2024. This 10-year plan calls on the government, in collaboration with state and community partners, to build an age-friendly state and **includes three key housing objectives:**

1. Increase the number of new units of high-quality affordable housing that enable residents to age well in community. (Goal: 5,000 new units)
2. Increase age-specific housing available for older Vermonters. (Goal: 3,750 new units)
3. Increase the number of older Vermonters who can "age in place" in their community.

Tax credits are the largest single source of funding for affordable housing in Vermont. Age-specific housing should have equal access to this critical funding resource. V4A appreciates VHFA's consideration of our feedback on this important public policy document.

Thank you again for this opportunity to submit comments on the 2026-2027 QAP. Please reach out to me with any questions or concerns at maryh@vermont4a.org or call me at (802)225-6210.

To: VHFA Development Team

From: The Center on Aging, Larner College of Medicine, The University of Vermont

Re: Comments regarding 2026-2027 Qualified Allocation Plan

Date: August 8, 2024

We at the Center on Aging appreciate the opportunity to provide comments as you begin to assemble a draft 2026-2027 Qualified Allocation Plan (QAP). The mission of the Center is to promote a sense of wellbeing and a high quality of life for older adults. The Center achieves our mission through research, education and public policy.

Given Vermont's aging demographic, we strongly urge you to remove the 30% cap imposed on age-specific housing projects seeking Ceiling Credits. Maintaining a cap to limit the development of housing for older adults is detrimental to meeting the housing challenges of this vulnerable and growing population. Tax credits are the largest single source of funding for affordable housing in Vermont, and age-specific housing should have equal access to this resource.

Our public policy work with the City of Burlington and the State through the Department of Disability, Aging and Independent Living and the Governor's Commission on Alzheimer's Dementia and Related Disorders makes clear the need for affordable housing for older adults and their caregivers. With almost 30% of our population 60 years of age or older and 70,000 Vermonters providing care to their older loved ones who need to age in place, affordable housing designed for the needs of older adults is a necessity. Currently, with the cap in place this equates to one property being built a year across the state. Another benefit of removing the cap is those older Vermonters who move into age-specific housing frees up housing stock for younger families.

Second, we recommend changing the Evaluation Criterion "Project Tenancy" to remove the distinction between general occupancy and senior housing, and simply provide checkmarks for any project that is service-enriched, and none for those that are not service-enriched. Otherwise, age-specific housing has two significant challenges to overcome (the cap and being ranked lower than general occupancy). Given the severity of the State's overall housing needs, and the growing housing needs of older adults, we do not think it is fair or appropriate that age-specific housing is ranked lower than that of general occupancy.

We at the Center on Aging will remain engaged as the QAP is developed and appreciate your consideration of our feedback on this important public policy document.

Subject:
Date:

From: home@vhfa.org <home@vhfa.org> on behalf of Christine Hart <home@vhfa.org>
Sent: Sunday, August 4, 2024 1:32 PM
Subject: [EXTERNAL]Form submission from Website Contact a VHFA Employee

Submitted values are:

Your Name: Christine Hart

Your Email: chrishart312@gmail.com

Message:

Hi Megan:

Here is a copy of my remarks from our meeting a couple of weeks ago. The references are to the handouts which I left with you.

Again, thank you both very much for making the long trip to Brattleboro and listening so closely to what we all had to say.

Comments made by Christine Hart to VHFA at their meeting in Brattleboro on July 26, 2024

Good morning, thank you for holding this meeting in Brattleboro!

My name is Christine Hart. I have been involved in many areas of affordable housing and specifically senior housing and senior issues for a few decades.

I am here representing Windham Aging, Windham County's very unique Collaborative to address the enormous growing population of seniors in the County over the next 2 years.

I have a small packet of information for you which will give you more detail on the Winham Aging Collaborative and the coming tidal wave of seniors in our County.

We are a collaborative of a large number of organizations and individuals concerned about aging well in our County.

We are a data driven aspirational group which will be looking for results and achievements from those who are in the best position to deliver them. We are not a NP nor are we going to start delivering services or building housing. We will push for those that can - to do so.

This chart is in your packet, and it dramatically shows that from 2020 to 2040 the number of those aged 75-79 grow from 1924 to 2921 = 997 individuals

Those from 80-84 grow from 1061 to 2387 = 1326 and

those from aged 85+ grow from 1050 to 2387 =1337.

This represented 3,660 people over 75, double the number we have in 2024.

In 2040 over 20% of the population in the County will be over 75.

Where are these folks going to live? Will we have enough appropriate housing for them? Will the housing we are currently funding have enough large bathrooms, wide hallways and other necessary design elements for folks to age in place?

I noted that the QAP qualifies Universal Design inclusion ‘to the greatest extent possible, at little or no extra cost’. Housing for folks to age in place, universal design and visitability does costs more. If we are approving housing for the future we must be aware that it must include these units and that they will cost more.

The Windham Aging Housing Group, which I head up., had a study done for us on the need for Residential Care, Assisted Living and Nursing Home need. I have included a short write up of this in your packet. But here’s the big take away= Windham County will need an increase of 487 beds by 2040. This is a conservative estimate, but we think one based on solid data.
What role can and will you play in this?

I have also included a short history on our Vermont housing development process over the last 30 plus years for perspective. In the 80’s when VHCB and the State began their very focused approach to developing affordable family housing and then included homelessness as it evolved, senior housing was limited by the QAP. It may still be and we would ask that any limitation be lifted. In fact, we would recommend that a certain percentage of the units built using State funds must include a certain % that are specifically for folks to age in place. We have been doing this for years to address homelessness, we see a huge problem coming, let’s address it now.

Finally, The QAP calls for market studies and there are plenty of them. We would like to see any market study, especially ones meant to demonstrate overall Town or regional need, include senior housing. Market studies are usually very specific to the population the indented development will serve. Well, if it’s going to serve families or another specific group then of course it’s going to demonstrate that need. But shall we start to address that need relative to the coming aging of our population? I think we need to insist that we look at the need of our aging population for any development that is being funded.

If you would like the full Housing Section Report, I would be very happy to send it to you.

Again, thank you for coming to Brattleboro, to listening to all our concerns and especially for your work on housing Vermonters.

This message was sent using the form found here: <https://link.edgepilot.com/s/b118129b/-ryeEsMUpkqfZyfHHo98hA?u=http://www.vhfa.org/about/staff>

Submitted on August 4, 2024

From: Jewett, Ellen <emckay@middlebury.edu>
Sent: Wednesday, July 31, 2024 10:09 AM
To: DevelopmentDept
Cc: David McKay
Subject: [EXTERNAL]Feedback for the Qualified Allocation Plan

My daughter with cerebral palsy, quadriplegia, profound deafness and IDD needs stable service-supported housing NOW. In the very near future we, her aging parents, will no longer be around to provide for her housing during the frequent gaps between homecare providers.

The state immediately needs 602 units of this housing. I am requesting that the 2025 QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the state priorities for awarding federal tax credits. This will help with the development of service supported housing for my daughter and others.

- Eligibility criteria specific to senior occupancy could be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling, and crisis prevention or intervention services.
- Development that sets aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set-asides for unhoused Vermonters.
- Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

Happy to answer any questions you may have.

*Ellen McKay Jewett
Program Coordinator*

*Scott Center for Spiritual & Religious Life
46 South St.*

*Middlebury College
Middlebury, Vermont 05753
Tel. (802) 443-5626*

<https://link.edgepilot.com/s/c687d93e/sQX88TJtbUGGeNwO32ev3w?u=https://www.middlebury.edu/office/scott-center>

From: home@vhfa.org on behalf of VHFA.org - Vermont Housing Finance Agency
<home@vhfa.org>
Sent: Tuesday, July 30, 2024 3:09 PM
To: DevelopmentDept
Subject: [EXTERNAL]Form submission from: QAP comments

Submitted on July 30, 2024

Submitted by: Anonymous

Submitted values are:

Organization name

Developmental Disabilities Housing Initiative (DDHI)

First name

Collins

Last name

Twing

Date

2024-07-30

Comment

Individuals with I/DD need choices stable, service supported housing to live in outside the family home, especially as parents are aging and no longer able to provide care and supports. According to the Housing Report by the VTDDC, Vermont immediately needs 602 units of this housing.

I am requesting that the 2025 QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the state priorities for awarding federal tax credits. This will help with the development of service supported housing for adults with I/DD.

1. eligibility criteria specific to senior occupancy could be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling, and crisis prevention or intervention services.
2. Development that sets aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set asides for unhoused Vermonters.
3. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

Thank you,

Collins Twing

From: home@vhfa.org on behalf of VHFA.org - Vermont Housing Finance Agency
<home@vhfa.org>
Sent: Monday, July 29, 2024 9:55 AM
To: DevelopmentDept
Subject: [EXTERNAL]Form submission from: QAP comments

Submitted on July 29, 2024

Submitted by: Anonymous

Submitted values are:

Organization name

Developmental Disabilities Housing Initiative

First name

Karen

Last name

Price

Date

2024-07-29

Comment

I submit this comment on behalf of the over 100 parents in the Developmental Disabilities Housing Initiative (DDHI). DDHI is a Vermont parent-run advocacy group. We are parents of adult children with Intellectual/Developmental Disabilities (ID/D) who support the development of stable, service-supported housing communities for our adult children, who have an ID/D diagnosis, qualify for Medicaid Home and Community-based Services (HCBS) waiver, and have significant support needs.

We are requesting that the 2025 QAP add language that includes adults with I/DD in the state priorities for awarding federal tax credits. This will help with the development of service supported housing for our adult sons and daughters.

1. The eligibility criteria specific to senior occupancy could be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling, and crisis prevention or intervention services.
2. Development that sets aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set asides for unhoused Vermonters.

3. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

Thank you.

Karen Price

karen.price@vtfn.org

From: home@vhfa.org on behalf of [VHFA.org - Vermont Housing Finance Agency](http://VHFA.org)
To: [DevelopmentDept](#)
Subject: [EXTERNAL]Form submission from: QAP comments
Date: Saturday, August 3, 2024 2:37:18 PM

Submitted on August 3, 2024

Submitted by: Anonymous

Submitted values are:

Organization name

Parent

First name

Robert

Last name

Price

Date

2024-08-03

Comment

I have an adult child with a intellectual disability. He will need stable service supported housing to live in once we, his parents are no longer able to care for him. The state immediately needs 602 units of this housing for individuals like my son. I am requesting that the 2025 QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the state priorities for awarding federal tax credits. This will help with the development of service supported housing for my son and others.

1. eligibility criteria specific to senior occupancy could be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling, and crisis prevention or intervention services.
2. Development that sets aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set asides for unhoused Vermonters.
3. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

Thank you.

From: [Sharon Medina](#)
To: [DevelopmentDept](#)
Subject: [EXTERNAL]VHFA Public Input on Recommendations regarding Federal Affordable Housing Resources
Date: Sunday, August 11, 2024 7:17:00 PM

8/11/24

My son Kristofor Medina, age 42 is Autistic and has an Intellectual Development Disability. The only home my son has ever known is with me, his mother who is now 72 years old. Before I leave this world I need to know that Kris will have service supported housing to meet his needs.

I have been an active member of the parent led Developmental Disability Housing Initiative for the last couple of years. We represent the hundreds of our sons and daughters who need service supported housing. Vermont immediately needs 602 units of this housing.

I am requesting that the 2025 QAP add language that includes adults with Intellectual and Developmental Disabilities (IDD) in the state priorities for awarding federal tax credits. This will make it possible for the development of service supported housing for my son and others.

The eligibility criteria specific to senior occupancy could be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling, and crisis prevention or intervention services.

Developments that set aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set aside for unhoused Vermonters. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

Please make this possible for my son Kris, as well as other parents sons and daughters who need safe and affordable service supported housing.

Most Sincerely,

Sharon Medina
13 Isabelle Rd.
Barre, Vermont
05641
Cell (802) 272-9788

Sent from my iPhone

From: [Linda Sukop](#)
To: [DevelopmentDept](#)
Subject: [EXTERNAL]Service-supported housing for adults with I/DD
Date: Saturday, August 10, 2024 6:58:47 PM

My adult child with a developmental disability will need stable, service-supported housing to live in once I, their parent, is gone. The state immediately needs 602 units of this housing. I am requesting that the 2025 QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the state priorities for awarding federal tax credits. This will help with the development of service-supported housing for my child and others.

1. Eligibility criteria specific to senior occupancy could be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling, and crisis prevention or intervention services.
2. Development that sets aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set asides for unhoused Vermonters.
3. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

Thank you very much for your attention and action on this issue.

Linda Sukop
Burlington

From: [Patricia Waite](#)
To: [DevelopmentDept](#)
Subject: [EXTERNAL]Re: 2026-2027 Qualified Allocation Plan
Date: Monday, August 5, 2024 3:05:19 PM

My 41 year old son with Down Syndrome and Lennox Gastaut Seizure Disorder has needed stable service supported housing since he turned 18 and I, as a newly single parent, could no longer house and care for him alone. In the years since, he has lived in 7+ "shared living" (adult foster care) situations as that is the only other option available to the Intellectually and Developmentally disabled population in Vermont. His living situation was never stable hence the need for us to identify and move him to a new SLP placement multiple times. Because he is considered to be in the category of highest needs, finding a new SLP with a wheelchair/handicapped adapted home was more than difficult. In October of 2022 after a year-long search for a new placement with no results, the agency who oversees his Medicaid Waiver funding and care had only a hotel room as a living option for him. At that point we, his family, had to resort to thinking outside the box. As fortune would have it, a newly constructed ADA apartment became available in Shelburne and we pooled personal funds to acquire it for him. A caregiver and team of helpers now live with him and provide his 24/7 care. As one of Vermont's most vulnerable citizens, he finally has a stable home. When caregivers come in and out of my son's life, he will no longer have to pack up and search once again for a place to live. This model has made such a difference in his life and for those who love him. It should be an option for every adult individual in the I/DD population.

Our state immediately needs **602 units of stable/secure** housing for my son's peers **PLUS** the staff to oversee and provide their care. I am requesting that the 2025 QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the state priorities for awarding federal tax credits. This will help with the development of service supported housing for my son and others.

Respectfully submitted,
Patricia Waite and family of Joseph Waite

From: [Foley, Juliane](#)
To: [DevelopmentDept](#)
Subject: [EXTERNAL]qualified allocation plan
Date: Sunday, August 4, 2024 6:39:17 PM

Dear VHFA.

Our son with (Sturge-Weber Syndrome and Epilepsy) IDD needs stable service supported housing to live in once we, his parents are gone. We live in Georgia VT. He is with us currently 24 hours a day 7 days a week. He is 21, developmentally aligned with that of a preschooler, verbal, sweet, and very dependent on us. He needs to gain skills to be as independent as he can be to set him up for success when we can no longer care for him. Housing choice is a critical piece to our ability to help him in this way.

The state immediately needs 602 units of this housing. I am requesting that the 2025 QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the state priorities for awarding federal tax credits. This will help with the development of service supported housing for my son and others like him in the state of VT.

Needed:

1. eligibility criteria specific to senior occupancy could be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling, and crisis prevention or intervention services.
2. Development that sets aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set asides for unhoused Vermonters.
3. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

Best Regards,
Juliane and Dan Foley

From: [Bennett Townley](#)
To: [DevelopmentDept](#)
Subject: [EXTERNAL]Public Comment On Update of QAP 2026-2027
Date: Saturday, August 3, 2024 6:12:21 PM

To whom it may concern,

Hi, I am a 26 year old and I live with my parents in Williston, VT. I have a Developmental Disability being on the Autism Spectrum and have other diagnoses. I still desire to live in stable service-supported housing with my friends in Williston and not live in a group home for the rest of my life or with my parents until they can't take care of me anymore.

I am writing to advocate for adults with Intellectual and Developmental Disabilities to be included in the QAP 2026/2027 as a state priority for awarding federal tax credits. This would help develop more housing for those with IDD and support my friends to have more independence with support, and get to have a place to call home that isn't our parents' place or a group home.

Thank you for considering my input.

Bennett G. Townley

From: j.e.townley1@gmail.com
To: [DevelopmentDept](#); [DevelopmentDept](#)
Subject: [EXTERNAL]Public Comment Input on the 2026-2027 QAP Update
Date: Saturday, August 3, 2024 3:21:12 PM

To Whom it May Concern,

My 26-year-old son with a developmental disability needs stable, service-supported housing to live in that is affordable and with the proper level of support. His father and I are retired and he currently lives at home with us, but desires to have the opportunity to live with his friends like others his age do. We are requesting that the 2024-2025 Quality Allocation Plan be amended by adding language that includes *adults with intellectual and developmental disabilities that are eligible for home and community based services* in the state priorities for awarding federal tax credits.

We would also like to put forth for consideration:

- The eligibility criteria specific to senior occupancy could be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling, and crisis prevention or intervention services,
- Development that sets aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set asides for unhoused Vermonters.
- Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

Thank you for your consideration and the opportunity to provide comment.

Ed & Jenn Townley, Developmental Disabilities Housing Initiative family & member of the Vermont Developmental Disabilities Council

From: [Marla McQuiston](#)
To: [DevelopmentDept](#); [Tim McQuiston](#)
Subject: [EXTERNAL]Input for QAP
Date: Thursday, August 1, 2024 4:25:05 PM

Our son with (Down Syndrome) an Intellectual and Developmental Disability (IDD), needs 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 are requesting that the **2025 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.

Please consider these other supports for development of IDD housing:

1. Eligibility criteria specific to senior occupancy could be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling, and crisis prevention or intervention services.
2. Development that sets aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set asides for unhoused Vermonters.
3. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

THanks for your consideration,
Marla and Tim McQuiston
Williston VT 05495

Marla McQuiston
marlamcquiston@gmail.com
201 Southfield Dr
Williston, Vermont 05495

[https://link.edgepilot.com/s/18b72185/RrnkKBzIyUeQZrFGs9iWew?
u=http://www.marlamcquiston.com/](https://link.edgepilot.com/s/18b72185/RrnkKBzIyUeQZrFGs9iWew?u=http://www.marlamcquiston.com/)

From: [Maura Lane](#)
To: [DevelopmentDept](#)
Subject: [EXTERNAL]housing
Date: Sunday, August 4, 2024 7:47:46 AM

.To whom it may concern, My son, Phillip has Down Syndrome. He is 43 years old and he will need a stable, service supportive housing to live in once his father and I are gone, The state immediately needs 602 units of this housing. I am requesting that the 2025 QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the state priorities for awarding federal tax credits. This will help with the development of service supported housing for my son and others. Thank you, Maura Lane

From: home@vhfa.org on behalf of [VHFA.org - Vermont Housing Finance Agency](http://VHFA.org)
To: [DevelopmentDept](#)
Subject: [EXTERNAL]Form submission from: QAP comments
Date: Friday, August 9, 2024 3:18:08 PM

Submitted on August 9, 2024

Submitted by: Anonymous

Submitted values are:

Organization name

Developmental Disabilities Housing Initiative

First name

Katie

Last name

Tormey

Date

2024-08-09

Comment

Hello,

I am writing to ask that individuals with Intellectual and Developmental Disabilities be designated as a priority in the distribution of funds for housing development.

My daughter Emily has Down Syndrome and is 35yrs old. Her father and I are aging and we need to know that she will be safe and cared for as needed once we are no longer alive. She needs Service Supported Housing; housing that is affordable, permanent and stable. Currently the State of Vermont is in need of 602 units of this type of housing. I am requesting that the 2025 QAP add language that includes adults with Intellectual and Developmental Disabilities (IDD) in the states priorities for awarding federal tax credits. This will help with the development of Service Supported Housing for my daughter and others.

I am also requesting that eligibility criteria specific to senior occupancy be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling and crisis prevention or intervention services.

Development that sets aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set asides for unhoused Vermonters.

Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

Thank you for this opportunity ,

Sincerely,

Katie Tormey

From: [Donna Savage](#)
To: [DevelopmentDept](#)
Subject: [EXTERNAL]2026-2027 Qualified Action Plan REQUEST
Date: Friday, August 9, 2024 12:17:13 PM

Dear Development Staff at VHFA,

First, I want to say that I am grateful for all the important work you do. Thank you!

I am specifically writing today to ask that as you are completing the thoughtful work to develop the **2026-2027 Qualified Action Plan (QAP)**, that you will please, *please* consider individuals with Intellectual and Developmental Disabilities (I/DD) and designate this very vulnerable group of Vermonters as a TOP priority in the distribution of funds for housing development.

This is a segment of the population that has largely been overlooked in our state and as a result has been without "forever homes" and left with very few options for safe housing when their parents and/or guardians are no longer alive to care for them. It is beyond a sad situation - one would even say shocking - and has only in the past few years come to the forefront of the housing debate due to the relentless advocacy of the Developmental Disabilities Housing Initiative (DDHI) of which I am a part. The DDHI is a grassroots VT advocacy group made up of about 100 aging parents of adults with I/DD and higher support needs. We formed in 2021 in order to begin the development of stable, service-supported housing that our children so desperately need, but due to their very limited communication skills (many are non-verbal), cannot advocate for themselves. Our adult children are unlikely to *ever* be able to live independently. For this population, Vermont's "solution" has often resorted to sending them out of state.

My son, Jack, has significant and lifelong disabilities, including being profoundly deaf, visually impaired, non-verbal, and severely developmentally delayed. He needs 24/7 care and 1:1 support with ALL activities of daily living. Jack will undoubtedly require this care and support for his entire life. My husband - Jack's dad - and I would like to have a home in place for him, and be at peace knowing he won't be shuffled from house-to-house in the Shared Living Provider Model (adult foster care) which is the only option currently available to him in our state.

The VT Developmental Disabilities Council has identified an immediate need of **602 units** of housing for people like my son.

The State declares that they are: "committed and obligated to ensure that

any project funded, and those entities responsible for administering such funds, must affirmatively further fair housing, work towards overcoming illegal housing discrimination, **and broaden housing options for all people."**

- **Can we please add language to the 2026-2027 QAP that includes adults with Intellectual and Developmental Disabilities (I/DD) in the state priorities for awarding federal tax credits. Bringing "ALL PEOPLE" into the fold should be inclusive of those with I/DD.**

Thank you for listening and helping to develop service-supported housing for my son Jack and others like him with I/DD and the need for safe, affordable, and permanent homes.

Here are some additional details our DDHI group would like to specifically request:

- 1) Eligibility criteria specific to senior occupancy could be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling, and crisis prevention or intervention services.
- 2) Development that sets aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set asides for unhoused Vermonters.
- 3) Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

Most sincerely,
The family of Jack D. Savage (Donna, Patrick, and sister, Shea)
Williston VT

Donna Savage
cell: 802-503-5690

From: DLamden@dmavt.net
To: [DevelopmentDept](#)
Subject: [EXTERNAL] 2025 QAP URGENT REQUEST
Date: Tuesday, August 6, 2024 7:45:14 AM
Attachments: [Attachment.001](#)

Our son is 36 and has developmental disabilities as well as physical limitations resulting from cerebral palsy. He has a wonderful sense of humor and love for people.

Since he was 23, he has lived in 6 shared living arrangements. His care has ranged from good to utterly neglectful. My husband and I are in our mid-seventies. We worry constantly about Ari's future. We dream of safe, supportive housing for our son.

We are requesting that the 2025 QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the state priorities for awarding federal tax credits. This will help with the development of service supported housing for our son and others.

We strongly request the following:

1. eligibility criteria specific to senior occupancy could be extended to include occupancy by people with a wide range of disabilities who need on-site supports such as case management, counseling, and crisis prevention or intervention services.
2. Development that sets aside a percentage of units for people with disabilities should be incentivized in the same way that priority is given to set asides for unhoused Vermonters.
3. Community development projects that take a creative approach to integrating people with disabilities into affordable housing projects should also be a VHFA priority.

In Vermont there are no other choices but shared living. Individuals with Intellectual and Developmental Disabilities need to be designated as a priority in the distribution of funds for service supported housing development.

Thank you for considering our urgent request.

**Deborah Lamden and Enzo DiMaio
Charlotte**

Sent from my iPhone

From: [LAURIE MUMLEY](#)
To: [DevelopmentDept](#)
Subject: [EXTERNAL]QAP commentary
Date: Monday, August 12, 2024 9:02:06 PM

My son Joey is 22, autistic with moderate to high support needs, and minimally verbal. He needs stable, 24/7 service-supported housing with peers. The Developmental Disabilities Council reports an immediate need for over 600 beds for this population.

I am an aging single mom of two. He needs appropriate housing NOW, not in ten or fifteen years. There are currently zero options for him in Vermont (the adult foster care model is not appropriate for people like my son).

I am asking that people with developmental disabilities and moderate to high support needs be added as a PRIORITY in the QAP language for awarding state tax credits. My hope is that developers are strongly motivated by these incentives and appropriate housing is developed.

This population has been ignored for far too long.

Thank you,
Laurie Mumley
Shelburne VT

Sent from my iPhone

From: home@vhfa.org on behalf of [VHFA.org - Vermont Housing Finance Agency](http://VHFA.org)
To: [DevelopmentDept](#)
Subject: [EXTERNAL]Form submission from: QAP comments
Date: Tuesday, August 13, 2024 8:11:47 AM

Submitted on August 13, 2024

Submitted by: Anonymous

Submitted values are:

Organization name
DDHI

First name
Beth

Last name
Davsi

Date
2024-08-13

Comment

Our son with Autism (I/DD) needs stable service supported housing to live in once we, his parents who are in our 70's, are gone. Currently he is living with my husband and me, and our Designated Agency has been trying to find housing for him for the past three years. The state immediately needs 602 units of this housing. I am requesting that the 2025 QAP add language that includes adults with Intellectual and Developmental Disabilities (I/DD) in the state priorities for awarding federal tax credits. This will help with the development of service supported housing for our son and others.

Sincerely,

Mike & Beth Davis

Shoreham, VT