



October 3, 2025

Tara Hall
North Carolina Housing Finance Agency
3508 Bush Street Raleigh, NC 27609

Subject: 2026 QAP Comments

Ms. Hall,

On behalf of the undersigned organizations and advocates, thank you for the chance to comment on the draft **2026 Qualified Allocation Plan (QAP)**. We appreciate NCHFA's long-standing leadership in expanding housing opportunities for people with disabilities. The Targeted and Key programs were groundbreaking when first introduced, and we hope to build on that strong foundation.

North Carolina continues to face a serious shortage of inclusive, affordable housing for individuals with intellectual and developmental disabilities (I/DD). More than 18,000 people remain on the waitlist for the Innovation Waiver. Many families have no options other than institutional care, group homes, or relying on aging caregivers. While group homes are the right fit for some, many people with I/DD can and want to live independently in the community with the right supports. Every individual is unique, and families deserve meaningful choices.

Why This Moment Matters

North Carolina has made a clear commitment to expanding housing opportunities for people with I/DD through the Olmstead goals outlined in the DHHS Strategic Housing Plan. To achieve these goals, the QAP should align with the state's supportive housing priorities and actively drive the development of more inclusive housing. Other states provide useful models to learn from and apply in North Carolina, such as:

- **Pennsylvania** (QAP Section 4.2.2.4) reserves at least two competitive 9% awards each year for projects serving targeted populations, including individuals with disabilities.
- **Massachusetts** (QAP Section XI, B-5) awards scoring points for projects that set aside up to 15% of units for people with disabilities, but only if services and design are appropriate for the population.
- **Florida** requires that at least 10% of units in LIHTC projects be set aside for people with I/DD.

Recent federal changes also create new opportunities. The *One Big Beautiful Bill Act (OBBBA)*, signed into law this summer, permanently increased the pool of 9% Low-Income Housing Tax Credits (LIHTC) by 12% beginning in 2026. This expansion means North Carolina will have more credits to allocate. We urge NCHFA to ensure that a portion of these new credits are directed to high-opportunity areas and to projects that serve people with I/DD. This is a chance to grow the supply of inclusive housing and deliver on the state's Olmstead goals.

Recommendations for the 2026 QAP

To further align the QAP with the state's supportive housing goals and take advantage of new federal resources, we recommend the following actions:

1. **Reserve 9% LIHTC awards for projects that demonstrate strong capacity to serve targeted populations, such as I/DD.** This would expand the program's impact in creating new supportive housing and ensure that developers awarded credits have demonstrated competency serving these populations.
2. **Strengthen scoring criteria for supportive housing set-asides** by awarding points for:
 - a. Demonstrated provision of population-specific services and project design
 - b. Integration of Section 811 rental subsidies and experience with Section 811 compliance in prior projects
 - c. Proximity and accessibility to organizations with capacity to provide healthcare and supportive services
 - d. Commitment to enhanced accessibility and universal design features
3. **Expand and improve accessibility and unit mix standards by:**
 - a. *Separating fully accessible units and visual and hearing impaired units.* Currently these are overlapping with the fully accessible units, and instead meet those requirements to be built into type B units to preserve fully accessible units. We believe these upgrades could be achieved through a reasonable modification, rather than requiring fully accessible, wheelchair-accessible roll-in showers.
 - b. Increase 1-bedroom unit production at each development.
 - c. Increase fully accessible wheelchair accessible roll-in shower units from 5% to 10% (F)(3)) section in QAP.

Additional Policy Suggestions for NCHFA

We believe that any project serving an I/DD population must demonstrate experience with and provision of population-specific services, since this piece is critical to layer on top of the foundation of affordable housing. Additional policy changes NCHFA could consider include:

- **Increase Targeting set-aside requirements in high-opportunity counties to 15%.** This would better align with the state's goals of expanding supportive housing in communities that offer access to jobs, transportation, and services.
- **Expand funding for Transitions to Community Living (TCLI) to support individuals with I/DD.** TCLI has demonstrated success in supporting positive outcomes for people with mental health needs, and expanding eligibility to the I/DD community would further the state's Olmstead goals.
- **Adjust the Supportive Housing Development Program (SHDP) to have greater impact by pairing subsidies with 4% LIHTC awards.** This coordination would stretch each SHDP dollar and better support inclusive housing integrated into larger affordable communities. A maximum SHDP award with matching funds now creates about 5 units at current costs. Combined with a 4% LIHTC award, that same subsidy could support a 40-unit project with 8 supportive units. Other states, such as Massachusetts, through its' Community Based Housing program, use similar models to promote supportive community living.

We thank NCHFA for the opportunity to provide our thoughts as deeply committed practitioners, advocates, and people with lived experience. Thank you for all of your work in expanding affordable and supportive housing in North Carolina.

Signed,

1. Laura Wells, Executive Director, HOPE NC
2. Kevin Giff, Collective Impact Manager, HOPE NC, UNC Community Practice Lab
3. Orah Raia, Co-Founder, HOPE NC
4. Ginny Dropkin, Secretary, Board of Directors, HOPE NC
5. Lauren Winfrey, Program Manager, HOPE NC
6. Grant Pearson, Board Member, HOPE NC

7. Susan Astre, Parent/Advocate, HOPE NC
8. Deb Levin, , HOPE North Carolina
9. Dr. Ryan Lavalley, Primary Lead, UNC Community Practice Lab
10. Kelly Bohlander Friedlander, Director, Community Bridges Foundation
11. Virginia Knowlton Marcus, CEO, Disability Rights North Carolina
12. Tonya Sheffield, President, Happy Hill Neighborhood Association
13. Catina Bethea, BIC, CB REALTY
14. Nancy Simpson, Advisory to Board, Independent Works
15. Robert Ferber, MD, President, IndependentWorks
16. Joseph Francis, Board Member, IndependentWorks
17. Rachel Bearman, Executive Director, Meals on Wheels Orange County, NC
18. David Curro, CEO/Founder, Midtown Housing Coalition
19. Christopher Anderson , Board Member , Midtown Housing Coalition
20. Christopher Dale, Midtown Housing Coalition
21. Sandy Johnson, Board Member, Midtown Housing Coalition
22. Amanda Valmassoi, Board Member, Midtown Housing Coalition
23. Cecil Cottrell, Board Member, Mount Jubilee Ministries
24. Jeffrey D. Holland, President, My Forever Home
25. Susan Singer, Advocate
26. Baiyina Muhammad, Executive Director, North Carolina Black Disabilities Network
27. Jamezetta Bedford, Commissioner, Orange County
28. Amy Fowler, Commissioner, Orange County
29. Angela McCants, Family Caregiver, PACID: Parent Advocates for Adults with IDD
30. Carol Conway, , PACID: Parent Advocates for Adults with IDD
31. Marisa Kathard, , Parent of Adult with IDD
32. Alisa Ginyard, Family Support Coordinator, Reality Ministries
33. Mary Margaret Licisyn, Managing Principal , Surface Area Partners, LLC
34. Dr. David Docusen , CEO , The Neighborliness Center
35. Jeffonda "Jae" Evans , Project Manager , Thee Garden of Eden, LLC/Unique Souls, LLC
36. Tony Hall, Community Resource Specialist, Triangle Disability & Autism Services
37. Jennifer Pfaltzgraff, Executive Director & Mother of adult child with IDD, Triangle Disability & Autism Services, Inc.
38. Kimberly Schlegel, LCSW, , UNC Chapel Hill, Carolina Institute for Developmental Disabilities
39. Diane M Corbin, , United Methodist Church
40. Khalilah Johnson, PhD, Assistant Professor, University of North Carolina at Chapel Hill
41. Fred Hathaway, Executive Director, We Will Walk With You
42. Allison Martin
43. Jamie Poe
44. Elizabeth Mckenzie, Caregiver
45. Darien Smith, IDD Client
46. Neva Bartholomew
47. Sudha Shreeniwas, Caregiver
48. Blanca Gonzalez, Caregiver
49. Lisa Dankner, Guardian of person with IDD
50. Laura Fischler, Parent
51. Mary Lou Krasnick
52. Jessyka Glatz
53. Tamara Watson
54. Cheryl Powell, Self-Advocate
55. Sagoo Arora, Caregiver
56. Betsy Short

57. Ann Ravenscraft
58. Jarrett Mansergh
59. Tifini Ferrell
60. Marie Corwin
61. Susan E Swanson
62. Frances Scarlett
63. Margaret K Pendzich, Caregiver
64. Sheryl Ponciano, Caregiver
65. Jessica Hight
66. Jeannine Hosking
67. Diane M. Siebrasse BSN, MPH
68. Jamie D. Hall
69. Vanessa Freeman, Caregiver
70. Susan Eisnor
71. Howard Singer
72. Joanne Hershfield, Caregiver
73. Sharlene M Simon, Caregiver
74. Barbara Aaron, Caregiver
75. Donna Forster
76. Sandy Demeree
77. Jean Mankowski
78. Lorrie Walter
79. Carol Key Brown, Caregiver
80. John Morris, Caregiver
81. Justine Brown, ,
82. Mary Elizabeth Stillwell, Caregiver
83. Allyson Sipple, Caregiver
84. Kimberly H Feller, Mom of 2 sons on the autism spectrum
85. Lorraine LaPointe, Caregiver
86. Amy Brisbois
87. Lisa Jo Wangberg
88. Ashley Brown, Parent
89. Cindy Ma
90. Kathleen Yusiewicz