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From: Richard Walsh <richardw@theperformancepoint.com>
Sent: Thursday, October 9, 2025 12:58 PM
To: RentalHelp
Subject: EXTERNAL: Subject: Public Comment – Recognition of NGBS (ICC-700) as a Standalone Compliance Path within the 2026 NCHFA QAP

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North Carolina Housing Finance Agency (NCHFA)

6537 Hudspeth Rd, Harrisburg, NC 28075
October 9, 2025

****To:**** North Carolina Housing Finance Agency (NCHFA) – Qualified Allocation Plan (QAP) Review Committee

****From:**** Richard Walsh, Performance Point LLC

****Date:**** October 9, 2025

Dear NCHFA Review Committee,

On behalf of Performance Point LLC, I respectfully submit the following public comment regarding the 2025 Qualified Allocation Plan (QAP) and the upcoming 2026 revision cycle. This comment addresses the strategic importance of recognizing the National Green Building Standard (NGBS, ICC-700) as a standalone compliance path and the need to ensure program continuity should the federal ENERGY STAR Multifamily New Construction (ESMFNC) program undergo a federal program transition.

NGBS as a Standalone Compliance Path

NGBS integrates ENERGY STAR energy performance benchmarks while expanding compliance to include water efficiency, durability, indoor air quality, and adaptability across multiple housing types. Recognition of NGBS as a valid compliance path would not replace ENERGY STAR but rather serve as a continuity safeguard within the QAP. Nearly 30 states currently recognize NGBS as a qualified green building standard for LIHTC projects, per Home Innovation Research Labs (2025). Neighboring states such as Georgia, Virginia, and Maryland already provide formal equivalency for NGBS, demonstrating its compatibility with existing verification structures.

Preparation for ENERGY STAR Program Transition

Given the potential restructuring or discontinuation of the ENERGY STAR MFNC program, it is prudent to incorporate a “Continuity Clause” within the 2026 QAP revision. This clause would allow for automatic substitution of NGBS Silver or higher in the event of ENERGY STAR program suspension, maintaining existing scoring and threshold equivalency. Such a provision would protect in-progress developments, maintain programmatic consistency, and avoid unnecessary administrative delays during federal program changes.

Programmatic Consistency and Verifier Integrity

Performance Point’s position is that strong verification frameworks—those emphasizing transparency, reciprocity, and credential consistency—benefit both regulators and market participants. Should NGBS recognition be adopted, verifier eligibility should extend to RESNET- and NGBS-accredited professionals to ensure continuity and compliance parity with current ENERGY STAR credentialing pathways. This preserves the integrity of third-party verification and ensures qualified professionals remain aligned with both state and national standards.

Conclusion

Recognizing NGBS within the NCHFA QAP would not alter project requirements but would instead secure stability during a period of federal uncertainty. It ensures that the State of North Carolina remains aligned with best practices nationally while maintaining verifiable, performance-based construction standards. This action reflects NCHFA’s continued leadership in proactive, forward-looking housing policy.

Thank you for your consideration of this recommendation as part of the 2026 QAP revision process. Performance Point remains committed to supporting NCHFA’s mission of ensuring quality, efficiency, and affordability in multifamily housing.

Respectfully submitted,

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