



October 20, 2025

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

Re: Comment on 2026 Qualified Allocation Plan Draft – Consideration of Resident Services for Senior and Family Housing

Dear Ms. Hall and Members of the North Carolina Housing Finance Agency,

Rainbow Housing Assistance Corporation ("Rainbow") respectfully submits this comment on the 2026 Draft Qualified Allocation Plan. We commend NCHFA for its thoughtful leadership in affordable housing development and for your comprehensive approach to addressing housing needs across North Carolina. The Draft QAP demonstrates a clear commitment to serving vulnerable populations through your Targeting Program requirements and Olmstead Settlement Initiative, recognizing that quality affordable housing must extend beyond construction to include meaningful support for residents with special needs.

As NCHFA contemplates the final 2026 QAP, we see an opportunity to extend this vision of service-enriched housing to North Carolina's broader affordable housing population, particularly seniors and families who, while not requiring intensive supportive services, would benefit tremendously from coordinated resident services that promote independence, stability, and self-sufficiency.

The Research: A Critical Gap Beyond Affordability

Recent research from Harvard University's Joint Center for Housing Studies, "The Rent Eats More: Residual Income Housing Cost Burdens from 2019–2023" (September 2025), underscores the critical importance of resident services in affordable housing. The study found that 67.5% of renter households in North Carolina are cost burdened, meaning that even when housing costs meet affordability standards, households struggle to meet essential needs such as food, transportation, healthcare, and childcare after paying rent.

This research validates what we observe daily: a household earning \$35,000 annually might pay \$875 in rent (perfectly affordable at 30% of income), yet still come up \$11,000 short of covering their family's basic needs for the year. For seniors on fixed incomes, the gap between housing affordability and true financial stability can be even more pronounced.

Resident services—including financial literacy, health education, technology training, workforce development, and community engagement programming—directly address these documented gaps and ensure that affordability leads to lasting stability rather than ongoing crisis management.

The Reality: Outcomes from Rainbow Communities

The transformative power of coordinated resident services is not theoretical. Among the residents Rainbow serves across the nation, we see daily evidence of how structured support changes trajectories:

Single Mother: Our resident came to us as a single mother facing a high-risk pregnancy who had been hospitalized for two months, leaving her \$1,775 behind on rent and facing eviction. Through persistent coordination with five local faith-based organizations, provision of financial literacy classes, and ongoing case management support, she secured full rental and utility assistance plus essential baby supplies. Today, she describes the experience as life-changing: "I have two younger children at home and I am a single mother so I was extremely thankful and grateful. This is a wonderful program who will stop at nothing until the job is complete. I truly feel blessed."

Unemployed Resident: Our resident reached out unable to afford his medication, without phone service, and unemployed. These interconnected barriers made job searching nearly impossible. Our team coordinated free pharmacy services through St. Vincent de Paul (with home delivery), secured a free cell phone through government assistance programs, submitted employment referrals, and provided ongoing coaching. Within weeks, he had consistent medication access, reliable communication, and was actively applying for jobs. His gratitude was profound: "Thank you for working with me and making it easy."

Career Advancement: Our resident worked tirelessly but struggled with work-life balance while seeking to increase her income. Through Rainbow's partnership with Auburn University's online phlebotomy certification program, daily encouragement, and persistent case management, she transformed from a high school graduate into a Certified Phlebotomy Technician. She credits Rainbow's comprehensive approach: "Rainbow does fundraisers and moves mountains for some of our residents. This will change the success of my life and my family's future. Couldn't be more grateful."

These stories share common elements: multiple, coordinated service interventions; persistent, individualized case management; partnerships with community resources; and outcomes that extend far beyond housing stability to genuine economic mobility and family wellbeing.

Considerations for the 2026 QAP

We recommend that NCHFA consider incorporating the following elements into the 2026 QAP to strengthen outcomes for senior and family housing developments:

- Award competitive points to developments that commit to providing structured resident services delivered by qualified providers.
- Require Memoranda of Understanding with service partners that outline scope, frequency, and measurable outcomes.
- Recognize CORES-certified providers, or equivalent credentialed organizations, to ensure quality and consistency.
- Require documentation that includes a resident services plan narrative, staffing approach, service budget, and annual performance reporting framework.
- Encourage flexible implementation that allows service frequency and focus to reflect community needs and property size.

These provisions would complement NCHFA's existing commitment to supportive housing services while extending meaningful support to the broader population of North Carolina residents in LIHTC properties, the 67.5% of renters who face residual income burdens even when rent is affordable.

Resident services are not a luxury; they are a strategic response to documented need. By recognizing and incentivizing comprehensive services within senior and family housing, NCHFA can ensure that aging residents and working families not only have a place to live but also the support to thrive in their communities.

We appreciate NCHFA's leadership and thoughtful approach to QAP development. We look forward to supporting future discussions that strengthen the connection between housing stability and resident services for North Carolina families and seniors.

Respectfully submitted,



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