June 15, 2026

Illinois Housing Development Authority
111 East Wacker Drive, Suite 1000
Chicago, Illinois 60601
ATTN: Strategic Planning & Reporting Department (SPAR)
Via email: QAPFeedback@ihda.org

Re: 2027 Draft Qualified Allocation Plan (QAP)

Dear SPAR,

On behalf of the undersigned organizations, I write to share feedback on the 2027-28 draft Qualified Allocation Plan (QAP). We are a broad coalition of organizations committed to expanding access to public and affordable housing across Illinois and promote investment in neighborhoods and communities that already have those resources. As part of that work, members of this coalition advocated for the creation of a powerful tool for building affordable housing in job and opportunity rich communities in Illinois. This advocacy resulted in the Affordable Housing Planning & Appeal Act (AHPAA). Since AHPAA's passage in 2003, our advocacy has focused on implementation of, and improvements to, the law—including advocacy during rulemaking in 2012-13 and 2025-26, and efforts to amend the law in 2023 and 2026.

We believe that Illinois' Low Income Housing Tax Credits (LIHTC) are a critical tool for ensuring that affordable developments are proposed—and built—in communities subject to AHPAA, known as "non-exempt local governments" or NELGs. In a February 2025 report, Impact for Equity investigated the intersection between AHPAA and LIHTC, and how well past QAPs have incentivized LIHTC proposals in NELGs.[1] Our findings suggest that while IHDA has incentivized developments in NELGs through the QAP since 2008, those incentives have not yielded a significant number of proposals or awards to build affordable homes in those communities.

We are pleased to see that the draft QAP addresses this concern by adding a Targeted Marketed policy track that awards five points to proposals in NELGs. We also appreciate that, while the largest point allocation is reserved for NELGs, the draft QAP recognizes the

[1] MARTIN COZZOLA & DANIEL KAY HERTZ, IMPACT FOR EQUITY, *Building an Affordable Illinois: Achieving the Vision of the Affordable Housing Planning & Appeal Act* (Feb. 2025), https://impactforequity.org/wp-content/uploads/2025/02/IFE_Building-an-Affordable-Illinois_Housing-Report_F.pdf.

need for affordable developments in municipalities that IHDA has previously called "at-risk" communities and still awards some points for proposals in those communities. We believe that AHPAA's passage in 2003 was a clear mandate from legislators to increase affordable housing in the state's least affordable communities and the approach outlined in the draft QAP appropriately adheres to that mandate. We are hopeful this will encourage affordable housing developers to look for more opportunities in NELGs.

We also believe the following issues should be clarified regarding the mechanics of the draft QAP:

1) The draft QAP indicates that all applications, whether applying through the general scoring criteria only or additionally through one of the three optional policy tracks, "will be competitively evaluated against one another within their respective geographic Set-Asides." Does this mean that there are no set-asides for each of the optional policy tracks? Given that proposals pursuing only the general scoring criteria cannot earn more than 80 points whereas proposals choosing one of the optional policy can score up to 100 points, do you expect applications that do not select an optional policy track to be competitive?

2) Within the Targeted Markets policy track, the draft QAP offers points for categories that are mutually exclusive—namely, the "Communities Lacking Affordability" category and the "Community Revitalization Strategies" and "Opportunity Zones" categories. Applications in NELGs would be awarded the maximum five points for Communities Lacking Affordability; however, such an application would never qualify for the points awarded for Community Revitalization Strategies or for being in a federal Opportunity Zone. The same is true in the inverse scenario. Thus, any application that selects the Targeted Markets policy track will never be eligible for the full 20 additional points. This does not appear to be the case in either the Creative Solutions or the Permanent Supportive Housing policy tracks—where one proposal could theoretically score all 20 points. Similar to the above question, does IHDA expect this to place applications that select the Targeted Markets policy track at a disadvantage relative to applications in the other two policy tracks?

It will take time to see how developers take advantage of this new scoring system and whether it results in more affordable housing in NELGs. We are hopeful that this change will meaningfully increase the number of applications in NELGs. To facilitate analysis of the efficacy of the incentive, we strongly encourage IHDA to publicly share data—including scores—on both applications and awards by policy track. While we understand that the changes to the scoring system in each QAP can make comparing proposals across different years (i.e. comparing the score for Proposal A in 2025 to the same proposal in 2026) difficult, the data can still be valuable for evaluating how well incentives used in a given year worked (i.e. comparing how Proposals A and B scored in 2026). We urge IHDA to begin publishing this data in an accessible manner going forward and for past LIHTC cycles.

In sum, we applaud IHDA's revision in the draft QAP that prioritizes development in NELGs in alignment with state policy via AHPAA and encourage IHDA to provide additional transparency in how the policy tracks will be used to determine awards. We further urge IHDA to monitor and publicly report on the impact of the change in the draft QAP.

Sincerely,

Abundant Housing Illinois
Connections for the Homeless
HOPE Fair Housing Center
Impact for Equity
Open Communities
YIMBY Law