



October 1, 2024

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

Subject: 2025 QAP Comments

Ms. Hall,

The undersigned organizations are submitting a joint letter in response to the request for comments for the draft 2025 Qualified Allocation Plan related to opportunities to expand housing options for individuals with intellectual and other developmental disabilities (I/DD).

We appreciate NCHFA's long-standing commitment to individuals with disabilities through the Targeted and Key programs. These programs were cutting-edge at the time they were introduced, and we respectfully offer policy suggestions responsive to the current context that can address a demonstrated unmet need. Despite best efforts to date, the evidence suggests that North Carolina lacks sufficient housing options that provide choice for families of individuals with I/DD. There are 18,000+ individuals with I/DD on the waitlist for the Innovation Waiver that provides home and community-based services.

Few housing options with appropriate supports exist for individuals with I/DD outside of institutional care or group homes, or remaining in family homes through adulthood with aging caregivers. For some, group homes provide an appropriate level of care and lead to positive outcomes. For many others, individual needs can be better met with coordination between direct care professionals supporting independent community living. Recognizing that every individual with I/DD is unique, we hope to expand the breadth of housing options available and provide families with increased choice.

#### QAP Alignment with State Supportive Housing Goals and Other State Approaches

We believe the following policy suggestions could help achieve the ambitious Olmstead goals set out in the DHHS Strategic Housing Plan by ensuring QAP policy aligns with the state's supportive housing goals. We look to other states to inform policy that would promote the creation of additional supportive units. Potential approaches include:

- **Pennsylvania, QAP Section 4.2.2.4.** PA reserves at a minimum *two competitive 9% awards* that support targeted populations, which include mental, physical, sensory, or developmental disabilities, among other groups. Such projects demonstrate the provision of necessary services and supports.
- **Massachusetts, QAP Section XI, B-5:** MA incorporates a QAP scoring bump for projects that include "Persons with Disabilities or Special Populations as Intended Consumers." The points will be awarded for projects with up to 15% of total units set aside for persons with disabilities. Critically, the points will only be awarded "*if the project design, amenity package, and population-specific services are appropriate for the population to be served.*"
- **Florida, 10% Set-Aside for I/DD:** Florida's QAP includes a provision that requires at least 10% of the units in a project to be set aside for individuals with I/DD.

### Recommendations for North Carolina QAP

Reserving 9% awards for projects which demonstrate appropriate supports for a targeted population, like I/DD, would both expand the 9% LIHTC program's impact in creating new supportive housing in support of the state's goals, and would also ensure that the provision of services is a component of that housing since it is a critical piece for positive outcomes for those residents. It would ensure that project developers awarded credits under this set-aside have demonstrated core competency in serving the unique needs of these populations.

Scoring for supportive housing set-aside could include:

- Points for appropriate population-specific services and project design
- Points for integration of Section 811 subsidy and for experience with Section 811 compliance in previous projects
- Points for accessibility to organizations with capacity to provide healthcare services; and
- Points for commitment to include enhanced accessibility and universal design features

### Additional Policy Suggestions for NCHFA Coordination

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. Other policy suggestions that could be coordinated with NCHFA include:

- **Increasing Targeted Set-Aside Requirements:** Increasing the Targeting set-aside requirement in high-opportunity counties to 15%.
- **Expanding Funding for Transitions to Community Living:** An expansion of funding for the Transitions to Community Living Initiative to allow support for individuals with I/DD. TCLI is a program with demonstrated success of providing critical support enabling positive outcomes for people with mental health issues. Expanding this program to the I/DD community would aid in furthering the ongoing Olmstead goal for the state.
- **Adjusting the Supportive Housing Development Program (SHDP):** Adjustments to the Supportive Housing Development Program (SHDP), allowing it to better support inclusive supportive housing integrated in a broader affordable community. Coordinating between SHDP and a non-competitive 4% LIHTC award would magnify the impact of each SHDP subsidy dollar and support the programmatic goal of Olmstead-compliant community integration. As an example, a maximum SHDP award (with required matching funds) would create around 5 units at current construction costs. That same award could support a 40 unit affordable housing project if combined with 4% LIHTC and would include 8 supportive housing units. Other states use similar subsidy programs to enable supportive community living, including Community Based Housing in Massachusetts.

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

Signed,

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