



**2027-2028 QUALIFIED ALLOCATION PLAN (HFA 109)
PUBLIC FORUM (Hybrid) | November 20, 2025
9:00 AM – 11:30 AM**

AGENDA

- Welcome and Introductions
- Forum Objectives
 - Gather feedback on proposed changes
- Key Discussion Topics – see table below
- Next steps
 - No newly recommended changes at this point in the process
 - Virtual forum – early January 2026
 - Formal public hearing – January 20, 2026
 - Board approval – February 2026

QAP Section (HFA)	Proposed Revision	Explanation
109.03.C LIHTC Availability and Set-Asides - Supplemental Set-Aside	Increase supplemental request limit from \$60,000 to \$90,000	To further support unexpected cost increases.
109.04.A Primary Program Policies - Maximum Amount of LIHTC per Project	Increase maximum allocation request limit: <ul style="list-style-type: none"> • GO: \$880,000 to \$942,000 • AR: \$660,000 to \$706,000 	To support increased costs and the need for increased sources like LIHTC equity.
109.04.B Primary Program Policies – Maximum Number of Applications and Projects	Include 4% LIHTC/Tax-Exempt Bond projects with Capital Subsidy in the number of current projects counted towards limit. 4% LIHTC/Tax-Exempt Bond projects without Capital Subsidy would not be included.	The number of projects – both 9% and 4% LIHTC – that any one developer has underway simultaneously has increased. This provides a guardrail so that multiple qualified developers have an opportunity to access LIHTCs.
109.04.C Per-Unit Cost Standards/Housing Investment Limits	Increase limits: <ul style="list-style-type: none"> • Standard TDC WA: \$375,000 to \$397,000 <ul style="list-style-type: none"> ○ Exceptions-moving to high-cost limit 	To support increased costs. Uncertainty remains around BABA costs, tariffs, labor shortages, and other factors that affect costs.

	<ul style="list-style-type: none"> • TDC WA High-Cost: \$400,000 to \$425,000 • TDC (not weighted): \$437,500 to \$464,000 • Investment limit: \$300,000 to \$315,000 	Given the expanded approval authority for the Executive Director (or their designee) to advance projects into the high-cost tier, the Board of Directors' annual authorization to raise the total development cost (TDC) and investment limits has been removed.
109.04.D Preservation/Recapitalization Project Initiative	Increase maximum allocation request limit from \$450,000 to \$470,000	This limit has not increased in recent years. While adding new units is the priority, an increase to this limit acknowledges cost increases.
109.05.C Application Submissions	Add a cure period provision to allow correction of minor defects upon request of NH Housing staff.	A cure period allows for the submission of missed documents or information, as a result of an oversight, at the request of NH Housing staff upon review of the submissions.
109.06.A Threshold Criteria – Site Plan Approval	Move site plan approval, that meets the requirements of RSA 676:4, I(i), from scoring to threshold.	Project readiness to proceed is a policy priority – moving this requirement from scoring to threshold supports this priority.
109.06.B Threshold Criteria – Feasibility and Eligibility	Provide clarity about the requirements to meet this threshold.	Updates made to ensure the requirements are clear.
109.06.C Threshold Criteria – Market Demand and E (formerly D) Completion of Prior Phase	<p>Provide definition of “phased project” as:</p> <p>A phased project is defined as one portion of an existing or planned development that is intended to be operated with another building(s) at or adjacent to the site, with or without shared amenities. Phased projects typically share a common access road and are commonly managed by the same management company, although each phase may have separate ownership entities and distinct parcels of land.</p>	Updates made to provide a definition of phased projects.
109.06.D (formerly C) Threshold Criteria – Capacity	Sponsor requirements were moved from the threshold criteria related to investor requirements, and the language was revised.	Moved to a more appropriate section in the QAP and updates made to ensure clarity.

109.06.I (formerly H) Threshold Criteria – Service Coordination & Appendix G	Revise minimum requirements outlined in Appendix G. Changes include but are not limited to; a reduction in the minimum hours and calculation method, expansion of requirements related to resident notification and service needs assessments, survey of residents, and submission requirements.	Changes reflect feedback from external partners and staff's experience – creating greater flexibility, while maintaining a commitment to effective service coordination for residents.
109.06.N (formerly M) Threshold Criteria – Minimum Scoring Requirements	Section added is moved from Allocation Process (109.A) with no changes.	Moved to a more appropriate section in the QAP.
109.05.N Threshold Criteria – Management Agent Training Requirements	Move management agent training requirements from threshold to the management agent questionnaire	Moved back to the management agent questionnaire to better align with management agent review and scoring.
109.07.A.2.d Scoring & Tiebreakers – Average Income Test Set-Aside	Add a new scoring category: 8 Points – Average Income Test Set-Aside where the average of all LIHTC income bands equals 60% of AMI or less. At least 40% of the units must be LIHTC units.	<p>To incentivize and encourage the selection of this set-aside due to the many benefits:</p> <ul style="list-style-type: none"> • Serves a broader range of incomes; higher rents help offset lower rent units that are deeply targeted • Serves extremely low-income households, reducing the reliance on limited rental assistance • It also reaches households earning between 60% of area median income and 80% - those who typically earn too much for traditional LIHTC units but cannot afford market-rate housing. • A mixed-income development fosters greater economic diversity and social integration within the development and community.
109.07.A.3.a & b Scoring & Tiebreakers – Supportive Housing	a. and b: Remove requirements for an MOU or agreement; instead rely solely on the letter of interest at this stage (application). Provide clarity and enhance requirements to ensure capacity to provide services and demand for the housing.	Update the process to better reflect the appropriate requirements at the application stage. Further incentivize the inclusion of supportive housing units within LIHTC projects.

	b. Increase points from 8 to 10.	
109.07.A.5.b & c, and 6.b. Scoring & Tiebreakers – Section 811 PRA Program	Remove points for committing to 25% of the total units to the Section 811 PRA Program.	The State of NH is no longer seeking up to 25% of total units designated for this program.
109.07.A.8.a Scoring & Tiebreakers – Project Grants and Assistance	Add a new scoring category: 2 Points - Projects that preserve existing public housing through HUD's Rental Assistance Demonstration (RAD) Program.	To support the use of this financing tool to preserve and improve/renovate public housing.
109.07.A.8.b Scoring & Tiebreakers – Project Grants and Assistance	Change long-term lease at “below market value” to “nominal” value and define that as at or below \$2,500 per year. Define donated land as having no acquisition cost to the project (land acquisition costs cannot be included in the development budget and cannot be paid by development sources).	To clarify the intention and ensure that the project is receiving meaningful financial benefit — as intended by this points category.
109.07.A.9.c Scoring & Tiebreakers – Advance Projects	For “twinned” projects; more clearly define an acceptable 4% LIHTC application in order to qualify for points for the 9% LIHTC project. Includes financial feasibility and the identification of all proposed funding sources, along with a narrative project description, and indicates whether the 9% portion can proceed independently in the event the 4% project is not funded.	To ensure sufficient information is submitted to assess the feasibility of the 4% project.
109.07.A.11 Scoring & Tiebreakers – Project Cost	Clarify types of projects subject to this penalty point category, including but not limited to, projects that qualify for the TDC WA High-Cost limit in section 109.04.C. Note: preservation/recapitalization projects are not subject to this category. A project's TDC WA will be compared to the overall average of the TD WAs in the current application round. Preservation/recapitalization projects will be excluded from this calculation. Criteria for higher development costs in this category have been updated to include adaptive reuse, projects subject	To provide clear expectations for points and to revert to a prior process of comparing a project's TDC WA to the current round average rather than the prior year's data. This encourages projects to pursue lower development costs in relation to current market conditions.

	to BABA, and projects located in Grafton, Carroll, or Coos County.	
109.07.A.15.a. Scoring & Tiebreakers – Property Amenities	<p>Developers now have a choice of property amenities to choose from, rather than being awarded points for only a community room. Points will be awarded for committing to at least one of these amenities in compliance with the requirements outlined:</p> <ul style="list-style-type: none"> • Community Room • Service Coordination Office • Patio Area • Picnic Area • Storage Units (outside of residential unit) • Bike Racks 	To acknowledge that each property has different needs and expanding this category provides more choices.
109.07.A.16.b/c Scoring & Tiebreakers – Energy Efficient Design and Construction	<p>Remove points for committing to participating in an energy charrette. Maintain removal of points for committing to Net Zero, LEED, GNGBS, or Enterprise Green certifications.</p> <p>Points to be reinstated for:</p> <ul style="list-style-type: none"> • Passive House certification - reduced from 8 points (originally) to 2 points; or • HERS rating - 2 points 	To continue efforts related to cost containment, while recognizing there are benefits to energy efficient design – narrowing down the points category to Passive House and HERS ratings at a reduced score.
109.07.A.17 Scoring & Tiebreakers – Renewable Energy	Points to be reinstated for solar electric arrays or geothermal heating and cooling – reduced from 4 points (originally) to 2 points.	To recognize there are benefits to renewable energy – at a reduced score.
109.07.A.18.c Scoring & Tiebreakers – Universal Design	<p>Add a new scoring category: 2 Points – projects that incorporate at least one of the universal design features listed in the QAP:</p> <ul style="list-style-type: none"> • No-step entry ways in all common areas and residential units • Easy-grasp door handles in all common areas and residential units • Knee space beneath all sinks in all common areas and residential units • Flat panel light switches in all common areas and residential units 	<p>To encourage the integration of universal design features that promote aging in place, independence and dignity, and health and safety.</p> <p>NH Housing identified cost-effective design elements in this category, striking a balance between affordability and these benefits.</p>

	<ul style="list-style-type: none"> • Non-stick flooring in all common areas and residential units • Hand-held showerheads in all residential units 	
Appendix A – Progress Phase Requirements	<p>Provide clarity in several sections and add the following requirement:</p> <ul style="list-style-type: none"> • Submit evidence confirming the availability and capacity of utilities serving the project. 	To confirm the availability/capacity of utilities earlier in the process.
Appendix C – Final Allocation / IRS Form 8609 Requirements	<p>Provide clarity in several sections and add the following requirements:</p> <ul style="list-style-type: none"> • For projects financed with tax-exempt bonds, the final cost certification must include <ul style="list-style-type: none"> ○ Certification of meeting the tax-exempt bond financed-by test (formerly referred to as the “50% Test”). ○ Certification of meeting the “95-5 Test”. 	Expand and define requirements for the issuance of IRS Form 8609.
Appendix H – Homeless, At-Risk of Homelessness, and/or Veteran Certification	<p>Add the following to the definition of at-risk of homelessness:</p> <ul style="list-style-type: none"> • Fleeing domestic violence • Living with aging parents or other relatives that provide shelter and, without this housing option, would be homeless 	To expand the definition to include additional categories of people in need
Appendix J – Preservation/ recapitalization Scoring Matrix	Enhance the definition for expiring affordability points category and provide suggested documentation for all scoring categories in this matrix.	To provide clarity around supporting documentation to be submitted.