



February 5, 2025

Indiana Housing & Community Development Authority  
Alan Rakowski, Director of Real Estate Allocation  
30 S Meridian St, Suite 900  
Indianapolis, IN 46204

RE: 2026-2027 QAP Comments

Dear Alan:

Please find my comments to the first draft of 2026-2027 Indiana Housing Community Development Authority (IHCDA) Qualified Allocation Plan (QAP) below:

**Set Asides**

I am in support of IHCDA's commitment to the goal of serving persons experiencing homelessness through the Supportive Housing Set Aside category.

**Part 5.1.H.4 – Demonstrated ability to obtain funding for the Development**

With the language as is, it'd be almost impossible to meet threshold if even one source of funds was not yet committed at time of LIHTC application. I propose language be amended to, "However, if the combined value of all uncommitted, non-IHCDA sources exceeds 15% of the total development sources, the application will fail threshold."

**Part 5.4.F – Minimum Unit Sizes**

I am in support of the removal of this category.

**Part 6.2.F – Infill New Construction**

The proposed changes to this category would disproportionately and negatively affect small cities and rural areas since those communities often have a number of underused parcels in areas that are already largely developed. Changes to this scoring section as laid out in the first QAP draft work against IHCDA's housing goal to contribute to comprehensive neighborhood improvement in rural areas and small cities.

- I propose removing the requirement for previous residential or commercial use. These requirements are vague and not easily documented. The addition of this requirement excludes development on vacant properties which meet the intent of the infill category and prevents new development of affordable housing on prime pieces of property simply due to the fact that it has been unclassified or

undeveloped. Commercial or market rate developers snatch up sites like this in a hurry making it more difficult to develop affordable housing in desirable areas.

- I also propose removing the requirement for use of existing utilities and infrastructure. New construction and growth, especially in small cities and rural areas, often requires the reasonable extension of existing utilities and infrastructure. I request language be revised to specify that the site has reasonable access to existing infrastructure and utilities, or include an exception that “If all required infrastructure is not currently, or will not be, available on the proposed site(s), or on land directly adjacent to the proposed site(s)...a letter from the local jurisdiction must accompany the application confirming that no adequate infill opportunities exist within the community,” (North Dakota Housing Finance Agency 2025 QAP). This would allow for new development and expansion in underserved areas with limited access to utilities and infrastructure.
- To avoid unintended use of the infill category, you could require the site be surrounded by residential or commercial development on 3 sides to further demonstrate that it meets the intent of the infill category.
- To further avoid unintended use of the infill category and ensure protection of farmland, I propose that you require the site meets the requirements of the Farmland Protection Policy Act which protects conversion of farmland to nonagricultural uses by identifying urban areas prime for growth via US Census data.

### **Section 6.3.C – Desirable Sites – Opportunity Index**

I do not support the removal of the Access to Employment scoring category as it is vitally important to low- and moderate-income households to be close to employment opportunities. Evidence of nearby employment opportunities helps determine which projects are more likely to support IHCD's goal of connecting residents with services to enhance self-sufficiency and quality of life.

### **Suggested Additional Scoring Category – Indiana-Based Businesses**

Since the XBE development team scoring categories were removed, it would be beneficial to add an additional scoring category promoting development teams with members which are Indiana-Based Businesses. Points could be awarded on a sliding scale, similar to the removed Minority Business Enterprise (MBE), Women Business Enterprise (WBE), Federal Disadvantaged Business Enterprise (DBE), Veteran-Owned Small Business (VOSB), and Service-Disabled Veteran-Owned Small Business (SDVOSB) scoring category in the 2025 QAP. Keeping financial resources produced by the LIHTC program within Indiana furthers IHCD's vision and mission by helping to create a sustainable quality of life for all Hoosiers in the community of their choice and providing housing opportunities, promoting self-sufficiency, and strengthening communities through Indiana-Based Businesses and their employees.

**Section 6.5.C – Emerging XBE Developers**

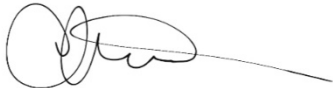
I oppose the decision to remove this scoring category since it promoted opportunities for partnership and collaboration amongst diverse teams. I urge IHCD to rethink this category by providing 1 or 2 points to teams that include an emerging developer (XBE or not). This would encourage affordable housing development teams with diverse backgrounds, fresh perspectives, innovative ideas, and creative thinkers, and ultimately would help to create more high-quality projects.

**Section 6.5.J – Developments from Previous Supportive Housing Institutes**

I am supportive of this scoring category since it is often difficult to obtain points on PSH developments. However, I propose there be a better way to clear the pipeline of older Institute projects by helping them compete in the Housing First Set Aside and/or other Set Asides. Perhaps you could vary points in this category by giving more recent Institute projects (2024) 3 points and older projects 6 points (2023 or before).

Thank you for the opportunity to provide comment on the first draft of the 2026-2027 QAP. I welcome any questions you may have regarding my comments above.

Sincerely,



Christine Deutscher  
President  
Neighborhood Development Associates, LLC