



Date: April 24, 2026

Re: Draft 2027-2028 Qualified Action Plan Public Comments

To: Vermont Housing Finance Agency

From: Chad Simmons, Executive Director, Housing & Homelessness Alliance of Vermont (HHAV)

Thank you for the opportunity to provide comments on the draft 2027-2028 Qualified Allocation Plan (QAP). This is a critical housing policy document and we appreciate the chance for a broad array of stakeholders to provide insights, expertise and constructive suggestions.

HHAV is a diverse coalition of more than 60 organizational members collectively working to build a Vermont where the fundamental right to housing is enjoyed by all.

Amongst our policy goals, we seek to maximize public investment in housing and services to benefit those who are most vulnerable to homelessness and housing insecurity, which includes those with the lowest incomes, and those historically and continue to be excluded from accessing housing. We understand this is done within the context of a complex and dynamic housing market, and as such, we see the QAP as an important guide to prioritize state and federal resources that benefit the people most impacted by homelessness and housing insecurity.

To provide some context and grounding, here are several principles that ground our comments on the draft QAP:

- We support thoughtful land use and planning to promote multiple priorities to achieve housing targets, including smart growth, energy efficiency and brownfield clean up.
- We support housing access that is not contingent on readiness, employment or participation in treatment or services. HHAV also sees that services to help people find and keep housing are essential.
- We believe that public dollars should deliver lasting public benefit, and we support housing investments that are permanently affordable for Vermonters with limited incomes.



- We seek to engage our members and people with lived experience and expertise in shaping housing policy to make families and communities stronger. We understand the work of equity and justice requires attention to how resources are allocated, how policies and systems are designed, and access to the process of decision-making.

With these in mind, we offer several comments, questions and suggestions to consider as the agency creates the next draft. All of these reflect member input over the last several weeks and numerous conversations with members and partners from across the state.

### **Draft Review/Comment Process & Timeline**

- Thank you for providing key updates and responses on [VHFA's QAP page](#). These responses regarding pre-application opportunities, state designation program integration and basis boost for non-profit set aside answer several questions/comments that members shared.
- Also related to VHFA's QAP page, would VHFA be willing to share a summary of the goals trying to be achieved by the proposed changes reflected in the draft QAP? Previous iterations of this page had previous drafts, summary of comments/responses, and (critically important), presentations reviewing the proposed changes and rationale for the proposed changes. This context and materials were extremely helpful in understanding the thinking and underlying goals of the proposed QAP changes.
- Would VHFA consider including an opportunity to review/add comment to a second draft? We feel having another opportunity to review a final draft would benefit the state and interested stakeholders to align with broad statewide housing goals.
- Would VHFA consider phasing in some of these changes over multiple QAP cycles? Overall, members shared that this draft reflects significant changes and upends processes and funding cycles. If we were to temper the changes and instead, phase them in over 2-3 years, this would allow for a soft landing and give other funders and developers time to align.



### **Application & Award Process**

- We ask that more than 30 days be given from time of materials being posted to the submission deadline.

### **Threshold & Evaluation Criteria**

- We welcome and encourage ongoing efforts to address costs and make affordable housing development more efficient. It is clear VHFA put a focus on these important components to housing development.
- We encourage the next draft to balance the goal of encouraging and allocating awards to projects that promote density, with the flexibility to develop in rural, less populated areas of the state. One of the most effective aspects Vermont's tax credit priorities, is ensuring geographic equity.
- We encourage continued prioritization in transformative housing development that balances housing development costs, with investing in developments that meet multiple state goals including access to services and community, brownfield redevelopment and economic impact
- HHAV supports prioritizing projects that reach those with the lowest income, especially as it relates to housing those exiting homelessness. We also recognize that not all projects will be able to feasibly include a higher percentage of households at the lowest income levels. We encourage a balanced approach, ensuring services are provided and built into proposals for those most in need with the goal of mixed-income development, ensuring long-term financial success.
- We encourage the use of cost per square foot as a metric in housing costs criteria. This allows a more apples-to-apples comparison when looking at costs criteria, acknowledging some larger units are needed in some projects and some may need smaller units.