Outlook

[External] 2027 Draft QAP Comment

From Eric Walsh [redacted]
Date Thu 9/17/2026 1:17 PM
To Taxcreditquestions <taxcreditquestions@schousing.com>

Hi Kim,
My comment on the 2027 Draft QAP concerns the “Other Credits” category in Appendix C1, Section III(G). I recommend removing this category from the 9% LIHTC scoring criteria.
As drafted, the category awards points for qualifying for and utilizing certain additional tax credits without tying those points to the amount of financial benefit provided to the development. Unlike the Leveraging category, which awards points based on support per affordable unit, Other Credits does not establish a minimum financial contribution.

This scoring preference can disadvantage otherwise strong sites with access to jobs, services, and demonstrated housing demand simply because they do not qualify for these additional credits. It can also encourage applicants to pursue additional financing complexity and transaction costs primarily to remain competitive for an award.

Removing this scoring category would allow applicants to use these credits where they meaningfully benefit a development without disadvantaging otherwise competitive sites that do not qualify.

Thank you for considering this comment.

Regards,

Eric Walsh
AnchorPoint Development Partners
[redacted]