Home Innovation RESEARCH LABS™

October 5, 2026

South Carolina State Housing Finance & Development Authority
Attn: Kim Wilbourne, Multifamily Director
300 Outlet Pointe Blvd C,
Columbia, SC 29210

Dear Ms. Wilbourne,

On behalf of Home Innovation Research Labs, we are pleased to submit comments regarding SC Housing's Draft 2027 Qualified Allocation Plan (QAP). We respectfully request that SC Housing restore points for third-party green building certifications to Appendix C1 of the 2027 QAP. Specifically, we request that NGBS Green Certification be recognized among the certification program options.

Request to Restore Green Building Incentives

Third-party green building certification ensures affordable housing delivers healthy, durable, energy-efficient homes that remain affordable to occupy throughout their service life. The NGBS was specifically designed for residential projects and is affordable to implement, making it ideally suited for low-income housing programs.

While eliminating third-party green building certifications may appear to reduce project costs and improve affordability, it ultimately does the opposite – depriving residents of healthier and more energy-efficient homes while increasing their long-term housing costs. While green certified homes may cost slightly more to build than code-minimum homes, those modest upfront investments result in lower energy and water bills over the life of the property. By removing third-party green building certifications from the QAP, it shifts a greater share of housing costs to residents through higher monthly utility bills and increased maintenance needs. For true housing affordability, it is important to consider both the cost to develop affordable rental housing and the cost for residents to live in it.

Value of Green Building Verification

Third-party green building certification provides an independent, objective process for verifying that affordable housing projects achieve the level of quality and performance expected by the QAP. Accredited verifiers conduct multiple on-site inspections throughout construction, confirm compliance with the certification program requirements and identify deficiencies before they become long-term problems for building owners and residents.

This independent oversight complements—not replaces—the work performed by local building officials. Building departments verify compliance with the adopted building code, while third-party green building verification evaluates additional measures related to building performance, energy efficiency, durability, indoor environmental quality, and resident comfort. Together, these processes provide greater confidence that publicly funded housing will perform as intended.

The value of this additional oversight is well documented. SK Collaborative's case study, *The Value of Third-Party Inspections*, prepared for the Georgia Department of Community Affairs, illustrates how third-party verification identified deficiencies that would otherwise have remained hidden, including inadequate air sealing, mold growth, improper insulation installation, and missing HVAC filters. Correcting these issues during construction helps avoid higher operating costs, unnecessary maintenance, reduced building performance, and poorer indoor environmental quality for residents. Removing third-party green building certification from the scoring criteria of the 2027 QAP would eliminate this additional layer of quality assurance for future affordable housing developments.

National Green Building Standard Overview

NGBS Green Certification is based on the National Green Building Standard (NGBS), the only residential green building standard approved by the American National Standards Institute (ANSI). Developed through a consensus process led by the International Code Council (ICC) with broad industry participation, the NGBS reflects nationally recognized best practices for residential construction.

Unlike programs that focus primarily on a single aspect of building performance, the NGBS evaluates projects across multiple categories, including site development, resource efficiency, energy efficiency, water efficiency, and indoor environmental quality. To achieve certification, every project must demonstrate minimum performance across each category, ensuring a balanced approach to building performance rather than excellence in one area at the expense of another.

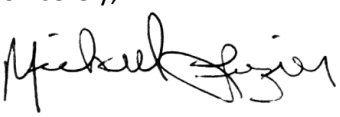
Because the NGBS was developed specifically for residential construction and is written in code language familiar to builders, designers, and code officials, it is both practical to implement and well suited for affordable housing developments. Combined with independent third-party verification, NGBS Green provides SC Housing with confidence that funded projects consistently deliver the quality, performance, and resident outcomes envisioned by the QAP.

Summary

Thank you for the opportunity to provide feedback on SC Housing's 2027 Draft QAP. We request that the incentive for third-party green building certifications is added back into the Final Draft of Appendix C1 of the 2027 QAP.

I am happy to meet with you, or your staff should you require a more detailed overview of the NGBS or our certification program. Please do not hesitate to contact Michelle Foster, our vice president of Sustainability, directly if she can be of further assistance. We look forward to working with you to promote green certified affordable housing in South Carolina.

Sincerely,



Michael Luzier
President & CEO