

Why Maryland's Housing Policy Must Do More for People with Disabilities

What is the Issue?

Maryland's 2026 Qualified Allocation Plan (QAP) and Multifamily Rental Financing Program (MRFP) will guide over \$300 million in housing investments. Maryland's 2026 QAP increases the maximum Low-Income Housing Tax Credit (LIHTC) award limits per project, allowing up to **\$30,000 per income-restricted unit with a \$1.5 million cap**, or alternatively **\$25,000 per unit** with a higher **\$2 million cap** in certain cases, representing a meaningful expansion from prior years when per-project caps were lower and more restrictive. This change enables individual developments to receive larger LIHTC allocations than in past cycles, improving project feasibility amid rising construction and financing costs. In addition, **the introduction of two competitive 9% LIHTC application rounds** in 2026, compared to the single-round structure used in some previous years.

Why this Matters

People with IDD face some of the longest waits for affordable housing in Maryland and have few community-based options that are connected to the services they need to live independently. As Maryland increases its investment in affordable housing, it is essential that people with disabilities are not left out of these opportunities.

What MIH is Advocating For

MIH urges Maryland to adopt proven, best practices in order to become the leading state in housing development for people with disabilities:

- The existing requirement that projects receiving credits must set aside 15% of units for people experiencing homelessness should be expanded to a combined 25% high-need set-aside that includes both people experiencing homelessness and people with disabilities, ensuring both populations are meaningfully served without forcing them to compete for limited scoring points.
 - * In addition, set aside units for people with disabilities should be required to accept referrals from disability service systems, including HCBS providers, the Developmental Disabilities Administration (DDA), the Maryland Department of Disabilities (MDOD) and other partner disability service organizations such as Maryland Inclusive Housing. This would be similar to how units serving people with disabilities must accept referrals from DHCD or Continuums of Care.
 - * This 25% unit set-aside requirement aligns with policies of other leading states. North Carolina, for example, has a 25% set-aside for homeless and disability populations. Indiana has a 25% community integration set-aside for people with disabilities.
 - * If the state cannot modify the unit set-aside threshold requirement, the state should, at a minimum, increase the existing scoring incentive so that projects serving people with disabilities receive a distinct and meaningful competitive advantage, rather than competing within a general "target populations" category, which includes seven other target populations people with disabilities.

What MIH is Advocating For

- ▶ The tenant services requirement for units that serve people with disabilities should be strengthened. Specifically, tenant services for units serving people with disabilities should be those provided by current Medicaid Home and Community-Based Services (HCBS) providers or by other providers within the disability services network coordinated by MDOD and DDA. There should also be a requirement that property staff are trained in compliance and other services to accommodate people with IDD as part of annual certification to CDA.
- ▶ A clear definition of **"special needs population"** that explicitly includes people with disabilities and people receiving HCBS.
- ▶ **Maintain and strengthen accessibility standards**, continuing to ensure that units meet all reasonable accommodation requirements and include plans for accessing transit, as needed.
- ▶ **Remove funding caps** that limit housing for people with disabilities.

What Can You Do?

Using the Maryland Inclusive Housing Recommendations, your own experience and thoughts, please choose one of the following listening sessions and express your opinions/comments and/or comment on the proposed plan by February 16, 2026 at dhcd.qap@maryland.gov.

2026 Qualified Allocation Plan and Multifamily Rental Financing Program Guide Revision Update and Schedule for Listening Session

The Department has released a draft revision of the Qualified Allocation Plan (the "QAP") and Multifamily Rental Financing Program Guide (the "Guide") for public comment. Beginning in the first week of February, the Department will hold a series of Virtual Listening Sessions to provide an overview of the last Round, solicit additional comments, and engage in a dialogue regarding revisions to the Qualified Allocation Plan and Multifamily Rental Financing Program Guide.

As drafted, the Qualified Allocation Plan would guide more than \$300 million in housing development investments through two application periods in 2026 by incentivizing project readiness and mixed-income housing, while also increasing the federal tax credit amount per project for larger communities.

Below are the dates and times of the Virtual Listening Sessions. Please feel free to attend as many of the meetings as you wish. Final date to comment on the proposed plan is February 16, 2026, comments due to dhcd.qap@maryland.gov.

*** Tuesday, February 3rd at 10 AM**

Video call link

PHONE: +1 413-351-4037

PIN: 434 514 218#

*** Wednesday, February 4th at 12 PM**

Video call link

PHONE: +1 843-779-9672

PIN: 511 027 150#

*** Thursday, February 5th at 6 PM**

Video call link

PHONE: +1 614-881-0057

PIN: 396 939 869#