



COMMISSION ON AGING

May 8, 2026

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Mr. Elmer Moore, Jr.
Chief Executive Officer (CEO) and Executive Director
WHEDA
908 East Main Street, Suite 501
Madison, WI 53703

Submitted electronically via HTC.FAQ@wheda.com

RE: 2027-2028 Draft Qualified Allocation Plan (QAP)

Dear Mr. Moore:

The Milwaukee County Commission on Aging submits the following comments related to WHEDA's draft 2027-2028 Housing Tax Credit Qualified Action Plan (QAP). The proposed scoring categories and point adjustments will negatively impact equitable access to supportive housing and diminish the QAP's ability to meet the needs of the state's growing population of older adults for affordable and accessible housing.

We are particularly concerned that the section on Strategic Priorities and Objectives is eliminated from the QAP including the objectives to increase the supply of affordable housing for low-and moderate-income individuals including older adults and those experiencing homelessness. Instead of criteria reflective of the greatest areas of need, the Strategic Priorities section is replaced with *carte blanche* discretion provided to the WHEDA authority without any such guidelines:

In the process of administering programs and resources, WHEDA will make decisions and interpretations regarding the QAP, applications, and properties. Unless otherwise stated, WHEDA is entitled to the full discretion allowed by law in making all such decisions and interpretations.

This Qualified Allocation Plan was drafted hastily and without adequate notice for public comment by those most affected. Older adults deserve to have their concerns heard and considered in this process of public allocation of resources.

The Milwaukee County Commission on Aging serves as the administrative and planning body for a comprehensive coordinated network of community services for the 192,000 older adults in Milwaukee County. The older adult population is the fastest growing demographic in the county. Both the Commission on Aging and the Milwaukee County Livable Communities Steering Committee have identified housing affordability as a key public policy priority.



We highlight the following concerns with the proposed QAP:

1. The shift in category from “Supportive Housing” to “Section 811 PBRA” narrows eligibility and creates an inequity among recipients of rental subsidies. This change means that only projects that utilize Section 811 funding, reserved for adults with disabilities 18-62 years of age, will receive WHEDA bonus points.
 - Section 811 cannot be used for persons 62+. This would effectively exclude most senior housing development from eligibility for supportive housing tax credits. Many seniors struggle with high housing costs and an inaccessible housing stock. Nearly 64% of Milwaukee County renters aged 65+ are paying 30% or more of their income in rent. This is the highest rate of rent burden of all age groups and is pervasive in census tracts across the county.
 - Section 811 would exclude some households that qualify as homeless per HUD definitions. Older adults are the fastest growing portion of the homeless population. This would also affect households experiencing homelessness due to economic factors, households at imminent risk (Category 2), and households experiencing domestic violence (Category 3).
2. We advocate for a greater weighting attached to “serves lowest income” in the scoring. It is very concerning that the total points for this category were reduced by 25 points, from 35 to 10.
3. Finally, the Wisconsin Aging Action Network has long advocated to expand low-income tax credits for developers by having the Wisconsin Housing and Economic Development Authority allocate a dedicated percentage of tax credits be set aside for older adult housing in its Qualified Action Plan (QAP). At a minimum we ask the scoring criteria for Senior housing be separated from Large Family housing as its own category and weighted at 19 points, equal to the percentage of older adults aged sixty-five in Wisconsin.

Given the affordable housing crisis and the growing population of older adults who desire to remain in the community, but who cannot relocate to accessible housing, a minimal set aside is an imperative to prevent increased homelessness, isolation, premature institutionalization and a shortened life span.

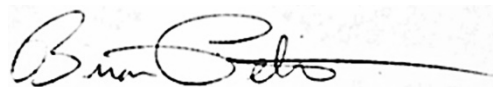
We urge WHEDA to reconsider these changes to the 2027-2028 QAP and work with local partners to ensure the QAP supports the state’s growing older adult population and their need for new affordable, accessible housing well into the future.

Thank you for your consideration of these comments in support of Milwaukee County’s older adults. Please do not hesitate to reach out with any questions.

Sincerely,



Denise Callaway
Chair,
Milwaukee County Commission on Aging



Brian Peters
Legislative Advocacy Officer
Milwaukee County Commission on Aging