

August 1, 2025

Dr. Cody Price
9% Housing Tax Credit Section Chief
Ohio Housing Finance Agency
2600 Corporate Exchange Dr., Suite 300
Columbus, OH 43231

RE: 2026-2027 QAP, First Draft Comments

Dear Dr. Price,

Thank you for the opportunity to provide feedback on the first draft of the 2026-2027 Qualified Allocation Plan (QAP). The Affordable Housing Alliance of Central Ohio (AHACO) is a coalition of 40 organizations who work through consensus to close the housing gaps in our eleven-county region.

There is much to admire in the Ohio Housing Finance Agency's (OHFA) first draft. Like continuing the two-year planning period, simplifying and streamlining scoring, nodding to Central Ohio's unparalleled growth via county limits, and recognizing a greater breadth of special needs, including housing that can purposefully lower infant mortality rates. These refinements reflect a clear effort to modernize the program while managing limited resources wisely.

In the interest of improving clarity, consistency, and fairness, AHACO's feedback will focus on two areas concerning the proposed Opportunity Maps where we believe the current draft could be adjusted to better reflect both community needs and the responsible use of public investment: (1) efficiently supporting family housing needs, and (2) ensuring balanced resource distribution across Ohio.

Efficiently Supporting Family Housing Needs: Promoting Choice & Economic Mobility

As you already appreciate, a family's housing search is an inherently personal process and often involves trade-offs that data cannot fully capture. Some families seek good schools and great amenities. While others want to return to the neighborhoods and families that raised them. Some migrate to a big city that offers economic mobility and a new career. While others need the connectivity and resources that small towns and rural areas offer. Some seek to be close to their faith and kin networks, while others pioneer new relationships. What is clear is that there is no singular path for a family's unique housing needs.

The Opportunity Mapping framework was originally designed to help the State make informed funding decisions across a range of neighborhood types that reflect this dissimilarity. As implemented in the

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Beacon 360 Management
The Columbus Foundation
Columbus Housing Enterprise
Columbus Metropolitan Housing Authority
Columbus Urban League
The Community Builders
Community Development for All People
Community Housing Network
Community Shelter Board
COMPASS at Broad Street Presbyterian Church
Creative Housing/Creative Renovations
Fairfield Homes
Finance Fund
Franklinton Development Association

Habitat for Humanity MidOhio
Home for Families
Homeport
Homes on the Hill
Huckleberry House
Impact Community Action
Jewish Family Services
Legal Aid Society of Columbus
Lutheran Social Services
Nationwide Children's Hospital
National Affordable Housing Trust
National Church Residences
NRP Group

Ohio Capital Corporation for Housing
Partners Achieving Community Transformation
Preservation of Affordable Housing
The Refuge
Renter Mentor
The RISE Center
Star House
TFG Housing Resources
United Way of Central Ohio
Wallick Communities
Woda Cooper Companies
YMCA of Central Ohio
YWCA Columbus

QAP, the Map offered another avenue for investments that, until then, were heavily concentrated in distressed areas. That approach, often referred to as the “Both/And” model, allowed OHFA to support both revitalization efforts in legacy communities and affordability strategies in more competitive housing markets. It was a model that facilitated data-informed decision-making, without losing sight of individual agency and the valuable contributions of smaller communities. As a result, OHFA was honored as a leader in this model, winning the 2017 Award for Program Excellence from the National Council of State Housing Finance Agencies.

The current draft marks a noticeable departure from this original intent and the successful implementation of the Both/And model. Instead of allowing residents to carefully weigh the neighborhood attributes that will help them reach their full potential, it creates a fixed, “Top-Down” set of Opportunity Dimensions that now serve as prerequisites for funding. As currently written, half of Ohio’s census tracts would be excluded from family housing investments, regardless of other strengths a proposed project might offer. Even without the threshold barrier, those tracts and many others will struggle to score highly enough to win funding.

Some hypotheticals highlight how outcomes may differ under the proven Both/And model versus a new Top-Down approach:

Situation: Jane needs full-time infant childcare to return to the workforce.

Both/And Model: Jane can choose between two LIHTC communities, one in an area with private childcare centers or one near her mom who will babysit for free from her home in an historic area.

Top-Down: The QAP only funds projects near private childcare.

Situation: John is offered a job with high advancement potential in a less affluent neighborhood.

Both/And Model: John can choose between two LIHTC communities, one where his neighbors have high incomes or one near his job, allowing him to save money and time on his commute.

Top-Down: The QAP only funds projects further from John’s workplace.

Situation: June’s middle-school daughter is offered free tuition at an elite private school.

Both/And Model: June can choose between two LIHTC communities, one near a B-rated public school or one near the private academy so her daughter doesn’t have to transfer city buses to attend.

Top-Down: The QAP only funds projects near the good public school.

Situation: James’ diabetes requires frequent kidney dialysis.

Both/And Model: James can choose between two LIHTC communities, one near a primary care facility, or one near the specialized dialysis clinic that accepts his insurance.

Top-Down: The QAP only funds projects near the primary care facility that can’t meet his health needs.

Situation: Jillian uses a meal delivery plan to keep her food costs low.

Both/And Model: Jillian can choose between two LIHTC communities, one near an organic farmer’s market she can’t afford to visit, or one near her church which has a weekly food and resource pantry.

Top-Down: The QAP only funds projects near the farmers’ market.

The Both/And Model is premised on the belief that the State is best position to enable residents to make free and informed choices on their housing needs, rather than assume that decisionmaker status

itself. While we all agree that good schools, good jobs, and good neighborhoods are important, the Both/And model acknowledges that “good” is subjective and often requires weighing personal factors that a static data set alone cannot capture, like price, waiting lists, and alternate family resources. A purposefully diversified LIHTC investment portfolio, with a range of neighborhood options, opens the door for this self-determination.

Ensuring Balanced Resource Distribution: Promoting Fair Access & Local Leveraging

LIHTC is a public investment backed by Ohio taxpayers. As such, it is important that the QAP maintain a balanced, statewide distribution of resources. This means proportional investments for each region and a balanced opportunity for all neighborhoods to compete. The Opportunity Map is a valuable tool in this process, but it should remain one tool among many.

Rather than using the maps to create a one-size-fits-all threshold and scoring system, which risks sidelining promising projects in neighborhoods with steep housing needs, the Both/And model can be more strategically deployed to incentivize catalytic development. By flagging potential weaknesses in the geography, the QAP can offer scoring bonuses for service packages, design features, or local partnerships that overcome those limitations.

This more traditional approach also opens a dialogue with local partners that can reveal important human insights that the Map misses. Which neighborhoods are showing early signs of gentrification, where the next major economic development deal is about to land, or where the city is preparing to commit big public infrastructure resources are critical pieces of information that will evade the Maps. Creating space for local expertise to complement hard data ensures that OHFA can move at the speed of business and benefit from real-time intel.

In other words, the Both/And model allows local ingenuity, innovation, and excellence to overcome the limitations of a “weak” site, ensuring that all communities can use their skills and resources to create a successful housing partnership with OHFA.

AHACO’s Recommendations

We respectfully recommend that OHFA retain the Opportunity Map as a guide, not a gatekeeper and continue supporting the Both/And Model that allows for balanced, flexible, and competitive housing investments. Specifically:

- Remove the “minimum threshold” under the Neighborhood Opportunity Index category; and
- Ensure scoring provides a balanced and viable path to funding for neighborhoods regardless of the Opportunity Index score.

Unrelated to the above discussion, we observe that a decade-old prohibition on housing discrimination was removed from the first draft. Assuming this was an editing error, we anticipate it will be restored before the QAP is finalized. AHACO supports transparent expectation-setting on fair housing rules for those who voluntarily seek out public funding and continues to recommend mirroring the HUD guidance implementing EO13988.

AHACO also continues to support using a more refined dataset for population-based metrics. Because the QAP guides thirty-year investments, and should be leveraged to support economic development and growth needs, population should not be based on an outdated snapshot-in-time, but rather, it should be based on the [State of Ohio's own population projections](#) for 2050.

Thank you for considering these comments. We are assured that OHFA's highly specialized expertise, proven track record of national leadership, and demonstrated commitment to advancing the State's interests will result in a final QAP that achieves both balance and impact.

I would be proud to help arrange a meeting for you and our team to discuss these ideas and insights further. Please let me know if your schedule allows for a conversation in August.

Sincerely,



Carile J. Boos, Executive Director
Affordable Housing Alliance of Central Ohio