

all inclusive living

August 1, 2025

Cody Price
9% Housing Tax Credit Chief
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, Ohio 43231

Re: 2026-2027 9% Qualified Allocation Plan

Dear Mr. Price:

On behalf of All Inclusive Living (All In), I'm pleased to provide comments on the 9% Qualified Allocation Plan.

All In is committed to expanding affordable, inclusive housing options for people with disabilities. Our mission is to help ensure that, if they choose, people with disabilities can live among neighbors of all abilities and ages in communities where they feel a sense of social connection, security and belonging. The need for such housing is rapidly growing in Ohio and we believe multifamily housing provides an excellent, underutilized platform for scaling resources to meet this need.

Tenant Populations with Special Housing Needs

All In welcomes the inclusion of people with disabilities as a target population with special housing needs. Our comments pertain to projects aiming to serve this population within the Non-PSH Policy Framework Set Aside.

1. Allocation Targets and Definitions

"The majority general partner or managing member must be a non-profit organization with experience developing, owning, or managing housing for the proposed target population(s)."

We support the intention of this requirement but do not believe it's necessary to prescribe that the majority general partner or managing member be a non-profit with disability-housing experience to achieve it. LIHTC-funded multifamily housing that has been intentionally designed and developed to serve people with disabilities is actually uncommon in Ohio; as a result, this particular housing sector is not well-developed, at least at this time.

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Requiring that a non-profit organization with disability housing experience be a key member of the development team is appropriate and necessary, but we do not believe it necessary that they serve as a majority general partner or managing member to ensure a successful project.

2. Tiebreakers

We do not support utilizing the same tiebreaker questions for all the set asides, specifically the second tiebreaker that would advantage projects with the highest percentage of targeted population units to total units. The special needs projects competing in the non-PSH Framework are not necessarily well-served by optimizing the number of units serving their target populations in a single housing setting.

This is the case for All In and we expect it will be the case for other disability-serving organizations as well. What we have clearly heard from people with disabilities is that they want more housing options that meet their needs but in settings that are diverse and inclusive by design. As a result, we intentionally cap the percentage of deeply affordable units set aside for people with disabilities at 25%. While this may seem counter-intuitive given our mission of increasing housing for adults with disabilities, it aligns with prevailing public policy and All In's commitment to creating inclusive communities in which housing is not segregated by ability or overly concentrated with units for people with disabilities. The tiebreaker as written will place an unfair disadvantage on inclusive housing projects so we strongly urge it be reconsidered, at least for the non-PSH Framework.

As a possible replacement tiebreaker, we suggest prioritizing transit access, which, while included in the QAP as of several lifestyle amenity options, warrants greater emphasis. Transit can be critical for many people with disabilities, older adults and other populations that deal with mobility challenges.

3. Scoring

We believe greater emphasis should be placed on essential elements such as high-quality service coordination and formal partnerships with providers and funders. These factors are currently undervalued in the current scoring framework relative to geographic factors.

Thank you for your consideration of our comments and your work to expand housing options for people of different abilities and ages.

Sincerely,



Mark Dunham
Executive Director