

To: OHFA Board and Staff

From: Animal Policy Group on behalf of American Pet Products Association

RE: Pet Ownership Amenity 2026/2027 QAP

VIA: In Person and QAP@ohiohome.org.

About APPA

The mission of the American Pet Products Association (APPA) is to promote responsible pet care and advance the pet products industry. Our membership consists of a diverse group representing both large corporations and growing business enterprises worldwide. APPA believes in protecting the strong bonds between people and their pets and that everyone who wants to experience the myriad benefits of having a companion animal in their lives should have access to a pet. To that end, APPA is committed to removing unnecessary barriers to ownership that are detrimental to pets in need, animal shelters and rescues that are seeking loving homes for those pets, and the people that benefit from their companionship and form rich bonds with pets in their homes. APPA and the undersigned organizations respectfully submit the following comments for consideration.

Official Comments

The current draft of the QAP includes the following amenity: **Pet Lease Addendum that includes no additional, nonrefundable fees for pets; no breed restrictions; no weight limitations.** We are grateful that the amenity category for pet ownership has been included in the current QAP draft. Previously, this amenity was eligible for points under the various QAPs and its inclusion in the 2026/2027 QAP is a positive step to OHFA promoting pet ownership in Ohio once again. Developers have demonstrated their willingness to include the amenity in previous applications. Per a public records request conducted in 2024, APPA has learned that 24 projects have utilized the lease addendum amenity for pet ownership in previous applications. APPA strongly encourages the OHFA Board and Staff to maintain the inclusion of the pet amenity.

The inclusion of the pet amenity category will promote more pet ownership in Ohio which, in turn, will result in less strain on dog shelters, local budgets, and veterinary clinics. Importantly, it will also help alleviate the well-understood problem of tenants and particularly low-income tenants, being forced to relinquish their pet(s) because they cannot find housing that is both affordable and that allows the pet(s). Some of the pets that are surrendered by tenants are euthanized in the worst-case scenarios. These changes in the draft QAP can help with all these issues currently facing pet owners in Ohio.

Not only will the addition of the amenity promote pet ownership here in Ohio, it will also provide OHFA with more tools to ensure accountability for developers using the amenity by adding parameters around the use of size and breed restrictions and extra charges that can make pet keeping unaffordable for low-income tenants. Placing these reasonable guardrails on pet policies allowed within the pet addendum will help with many issues currently facing tenants and their pets in Ohio.

Finally, it is our understanding that there has been some discussion about removing all amenities in the QAP process from consideration. One criticism of the amenities is that the inclusion of amenities raises costs to the projects. We are not commenting specifically on that debate. However, the addition of the pet ownership amenity would not increase ANY costs to the developer or the project. A lease addendum is simply an agreement between the property owner and the tenant. There are no physical changes to the property under this amenity. As such, this particular amenity would not be subject to the increased cost criticisms and therefore should not be included in any discussions regarding removal of the amenities.

We have included results from recent surveys below with notable findings for OHFA to consider when evaluating the value of the pet amenity in the QAP. These results further demonstrate the importance of amenity. For these reasons stated here, APPA respectfully requests that the OHFA Board and Staff retain the pet amenity in the 2026/2027 QAP.

Non-refundable fees make pet-keeping unaffordable for low-income tenants

Recent research assessing the relationship between census tract level Social Vulnerability Index (SVI) scores and pet relinquishments found that pets who are relinquished to animal shelters are disproportionately coming from more socially vulnerable parts of our communities.¹ Alarming, this data suggests that fully 80% of pets relinquished to animal shelters are coming from areas high on the SVI index. In practice, this means that pets are being relinquished most by people who are tenants, low-income or fixed-income households, people of color who are disproportionately impacted by limited access to affordable housing and high-wage jobs, or people with disabilities, among other things. This is unsurprising given our growing awareness in the research that affordability issues continue to be a primary driver for relinquishment.² A 2024 survey by Hill's found that "[p]eople with lower income levels report greater barriers to adoption due to experiencing pet-related housing restrictions."³ By ensuring that developers are unable to charge additional, non-refundable fees for a tenant with pets, OHFA will reduce the affordability burden for tenants who have pets and who are already vulnerable to experiencing housing insecurity.

Arbitrary breed and size restrictions restrict access to affordable housing.

Another study analyzing housing-related intakes across 21 U.S. animal shelters found that among all dogs relinquished due to housing-related reasons,⁴ large dogs and certain dog breeds, various types of shepherds, and even breeds like great danes, are often arbitrarily prohibited by landlords. The American Kennel Club states that "many large breed dogs have lower activity levels and are more

¹ Neal, S. M., & Kremer, T. (2024). Examining the Relationship Between Social Vulnerability and Animal Shelter Intakes and Outcomes: Patterns and Implications. *Animals*, 14(22), 3166 at p. 5. <https://doi.org/10.3390/ani14223166>.

² <https://www.hillspet.com/content/dam/cp-sites-aem/hills/hills-pet/shelter-program/pdf/shelter-equity-state-of-pet-adoption-2024.pdf>.

³ *Id.*

⁴ Applebaum JW, Loney L, Horecka K, Graham TM. Housing-related companion animal relinquishment across 21 animal shelters in the United States from 2019-2023. *Front Vet Sci*. 2024 Jul 10;11:1430388. doi: 10.3389/fvets.2024.1430388.

than happy to lounge on the sofa”⁵ and even Apartments.com lists Great Danes, Irish Wolfhounds, and Mastiffs as some of the best dogs for apartment living.⁶ The OHFA pet addendum amenity strikes the right balance. While developers will not be able to carte blanche discriminate against pets based on breed or size, they will retain the ability to have behavior-related policies in place to address concerns as they arise.

In one recent study, tenants living in subsidized housing, including LIHTC properties, were interviewed about their experiences trying to find affordable housing that would allow their pet or allow them to obtain a pet.⁷

The strong bonds between participants who had pets when they were searching for housing was abundantly clear. Participants did everything they could to find a place they could bring their pets or would choose to be unhoused rather than give up their pets.

Additional Key Research Supporting this Amenity

From a survey of just 21 animal shelters in the US, almost 30,000 pets have been relinquished due to underlying housing reasons. Pet relinquishment due to loss of home is on the rise in the U.S., indicating a significant need for more pet-inclusive housing for low-income Americans likely struggling the most with housing insecurity and more likely to be relying on subsidized affordable housing.⁸

Approximately 62% of households in Ohio own pets. Dogs are the most popular pets, as is true of the vast majority of states, with around 38% of Ohio households owning at least one dog while 29% own at least one cat. In addition, Ohio dog owners were most likely to report living on a tighter budget to afford their dogs’ expenses (51%).⁹

A recent study surveyed the landscape of pets, housing and the impacts on low-income families.¹⁰ A few notable findings from the study linked are important to the overall impact of including these edits into OFHA’s QAP program:

- “Pet ownership is not a protected status under the Fair Housing Act and therefore tenants are not protected from housing discrimination on the basis of having a pet in their family.”

⁵ American Kennel Club. Last visited July 23, 2025. *Best Dogs for Apartment Dwellers*. Available at: <https://www.akc.org/dog-breeds/best-dogs-for-apartment-dwellers/?size%5B%5D=xlarge>.

⁶ Apartments.com. Last visited July 23, 2025. *Adopting a Dog? Choosing the Best Apartment-Friendly Dog Breed*. Available at: <https://www.apartments.com/blog/adopting-a-dog-choosing-the-best-apartment-friendly-breeds>.

⁷ Mascitelli TM, Graham TM, Loney L, Applebaum JW, Murray CM, Binns-Calvey M, Hawes SM, Morris K. Barriers to finding and maintaining pet-inclusive affordable housing: Tenant experiences in Houston, Texas. *Front Vet Sci*. 2024 Oct 28;11:1465682. doi: 10.3389/fvets.2024.1465682.

⁸ *Id.*

⁹ Forbes. *Pet Ownership Statistics 2025*. (Jan. 2, 2025). Available at: <https://www.forbes.com/advisor/pet-insurance/pet-ownership-statistics/>.

¹⁰ Applebaum JW, Horecka K, Loney L, Graham TM. Pet-Friendly for Whom? An Analysis of Pet Fees in Texas Rental Housing. *Front Vet Sci*. 2021 Nov 8;8:767149. doi: 10.3389/fvets.2021.767149.

- “Despite the popularity of pets within U.S. households, their increased adoption during the pandemic, and the evidence that living with a pet may be beneficial for human health and wellbeing, the capacity to realize such benefits varies markedly based on the resources to which one has access. Indeed, there is evidence that, even though companionship and social support from pets may be most beneficial in times of stress and adversity, there are many structural barriers and larger social inequalities that stand in the way for disadvantaged and marginalized people to keep pets in their families and households.”
- “For example, housing issues are a commonly reported reason for animal relinquishment, particularly among low-income individuals.”
- “Studies investigating the demographic patterns of pet ownership have found that White people are more likely to own pets than those from other racialized backgrounds (particularly Black individuals), homeowners are more likely to own pets than people who do not own a home, and that wealthier people are more likely to own dogs than people with access to fewer economic resources.”
- “More than ever, there exists a need to consider the potential inequalities in capacities to keep and care for pets, which could be improved through better understanding and addressing access to affordable rental housing for pet owners.”

