



August 1, 2025

Via Email; [cprice@ohiohome.org](mailto:cprice@ohiohome.org) and [QAP@ohiohome.org](mailto:QAP@ohiohome.org)  
Cody Price, 9% Housing Tax Credit Chief  
Ohio Housing Finance Agency  
57 E. Main Street,  
Columbus, OH 43215

Dear Mr. Price,

On behalf of the Corporation for Ohio Appalachian Development (COAD) and our network of 17 Community Action Agencies serving Ohio's 30 Appalachian counties, we appreciate the opportunity to comment on the proposed FY 2026–2027 Qualified Allocation Plan (QAP) for the 9% Low-Income Housing Tax Credit (LIHTC) program.

We commend OHFA for its continued efforts to ensure equitable access to affordable housing across the state. However, we remain deeply concerned that the current structure of the QAP continues to disadvantage Appalachian communities, communities that are already under-resourced and face persistent barriers to housing development.

### **Experience in the Network**

In 2025, 16 developments received approved funding from OHFA through the 9% LIHTC program. Yet, within COAD's 30-county Appalachian footprint, only 3 projects were funded so far this year—representing just 18.75% of the total awards, despite the region accounting for nearly 30% of Ohio's geography. This underrepresentation is not a one-year anomaly. Over the past 10 years (2015–2025), out of a statewide total of 368 projects, only 46 9% LIHTC projects were funded across all 30 Appalachian counties. That's just 12.5% of the total awards reaching the region in the past decade. Even more concerning, 11 Appalachian counties—including Carroll, Guernsey, Harrison, Holmes, Meigs, Monroe, Morgan, Noble, Perry, Vinton, and Washington—received zero LIHTC projects during this entire period. Meanwhile, counties like Athens saw relatively more success, with 9 projects funded, but this remains the exception rather than the rule.

This data underscores the persistent structural barriers Appalachian communities face in accessing LIHTC resources. Without targeted strategies to improve equity in the allocation process, the region will continue to fall behind in meeting its affordable housing needs.

### **Affordability Gaps in Appalachian Ohio**

The Appalachian region of Ohio is home to some of the state's most economically vulnerable residents. In many of our counties, median incomes fall well below state averages, and housing cost burdens are disproportionately high. Yet, the majority of LIHTC-funded units continue to be priced at or near 60% of Area Median Income (AMI)—a level that is simply unaffordable for many of our residents. In fact, tenants in our region often spend more than 50% of their income on rent, even in units designated as “affordable.” This undermines the very purpose of the LIHTC program and places families at continued risk of housing instability and homelessness.



To address this, we urge OHFA to prioritize deeper affordability in the QAP by incentivizing units at 30% and 50% AMI, particularly in rural and Appalachian counties. Additionally, we recommend implementing a cap on annual rent increases in LIHTC developments to protect tenants from being priced out of their homes after move-in. In Appalachian communities—where incomes are often fixed or seasonal and housing options are limited—rent hikes can quickly lead to displacement. A model for this approach already exists: the California Tax Credit Allocation Committee ([CTCAC](#)) recently adopted a policy limiting annual rent increases to the lesser of 5% plus the percentage increase in cost of living or 10% of the lowest rent charged in the prior 12 months (CTCAC, 2024). Adopting a similar standard in Ohio would help ensure that LIHTC housing remains truly affordable and stable for Appalachian families.

### **Structural Barriers to Accessing LIHTC in Appalachia**

The current QAP scoring system favors developments in “areas of opportunity,” which are often defined by metrics that correlate with higher market rents and urban infrastructure. This inadvertently penalizes rural and Appalachian communities, where land is available and need is high, but where market conditions do not align with the algorithmic definitions of opportunity.

We ask OHFA to consider alternative scoring mechanisms or set asides that recognize the unique challenges of rural development and ensure that Appalachian counties are not left behind in the allocation of these critical resources.

### **Supporting Cultural and Historical Preservation**

We also want to express our appreciation for OHFA’s recent response to citizen advocacy regarding an archaeological review on two LIHTC-funded projects in Athens County. This is a promising step toward honoring Ohio’s rich precolonial and pioneer heritage. We encourage OHFA to formalize this practice by requiring archaeological review as part of the site approval process for all LIHTC applications. While we recognize the need to balance regulatory burden with development feasibility, we believe this is a meaningful way to protect Ohio’s cultural legacy—especially in regions like Appalachia, where historical sites are abundant and often overlooked.

A model for this approach already exists in the form of HUD’s NEPA (National Environmental Policy Act) review process, which could serve as a useful reference for implementation.

Thank you for your attention.

Megan Riddlebarger  
Executive Director  
Corporation for Ohio Appalachian Development