



July 31, 2025

Mr. Bill Beagle, Executive Director
Ohio Housing Finance Agency
2600 Corporate Exchange Drive
Suite 300
Columbus, OH 43231

Re: COHHIO Comments on Draft 2026 9% Qualified Allocation Plan

Dear Mr. Beagle:

Thank you for the opportunity to provide comments on the Draft 2026 9% Qualified Allocation Plan (QAP). COHHIO appreciates OHFA's leadership and commitment to providing safe and affordable housing for all Ohioans. We are grateful for our longstanding partnerships and the opportunity to reflect and provide comment on your proposed plan.

The Coalition on Homelessness and Housing in Ohio (COHHIO) is a coalition of housing organizations, homeless service providers, and individuals dedicated to ending homelessness and ensuring access to safe, decent, affordable housing for everyone in Ohio. COHHIO supports the comments and insights of multiple special interest collectives that are providing letters regarding the Draft 2026 9% QAP. This letter represents our main priorities for consideration.

Opportunity and Housing Needs Index

We appreciate the consideration of the OHFA staff to remove the Neighborhood Opportunity Index minimum threshold from consideration. This threshold would have had a disproportionate impact on Special Housing Needs pool and projects located in many rural areas and legacy cities.

However, the draft still proposes 75% of competitive scoring based on Opportunity and Housing Needs Index mapping. While we recognize the value of these tools, this heavy reliance creates several challenges:

- **Geographic Exclusion:** The maps effectively exclude entire communities from affordable housing investment, creating unintended geographic discrimination regardless of actual housing needs, community support, or development quality.
- **Circular Investment Logic:** By only investing in areas already deemed "high opportunity," communities needing investment to improve are excluded. This perpetuates inequality rather than addressing it.



175 South Third Street, Suite 580, Columbus, Ohio 43215
Ph: 614.280.1984 Fax: 614.463.1060
www.cohhio.org

- Local Market Disconnect: Housing markets are inherently local, but the maps use broad federal data that may not capture the nuanced reality of individual communities or neighborhoods.
- Place-Based Organizations at Risk: Ohio's rich history of community development corporations, innovative metropolitan housing authorities, and place-based developers may no longer be able to conduct their mission-based work in the communities they serve.

Expanding the Service Enriched Pool to Other Populations

COHHIO, as stated in a separate letter submitted with PSH stakeholders, encourages revisiting the *Ohio Interagency Council on Homelessness and Affordable Housing Permanent Supportive Housing Policy Framework* with relevant stakeholders before any significant changes are made to the Service Enriched tax credit pool.

The 2024 Point in Time data shows increases across the board for all homeless population types. Continuums of Care are all reporting family street homelessness for the first time, as well as senior citizens entering their homeless system. Overall homelessness in Ohio increased by 3% from 2023 to 2024 to 11,759 individuals. In an era of growing homelessness and a significant lack of affordable housing, expanding the Service Enriched pool without increasing the pool sufficiently does not make sense.

COHHIO recommends OHFA promote housing integration through the General Occupancy Pool by providing an incentive to develop housing with targets such that 25% of total units are intended to serve:

- Expectant mothers experiencing housing instability and are considered high-risk for poor maternal health or infant health outcomes
- Parenting students enrolled in a degree-seeking program
- Refugees

Of note many Refugees are not eligible to qualify for Federally Funded rental assistance. OHFA requires that “100% of the total units serving the target population must have a firm commitment for project rental subsidy or rental assistance, excluding HUD 811 PRA”. OHFA will need to consider other types of non-federal rental subsidy. It’s important to note that OHFA places Transition Aged Youth and Individuals with Intellectual and Developmental Disabilities as ‘non PSH policy framework set aside’ target populations when in fact they are clearly listed in the PSH Policy Framework.

Balance of State Set-Aside

COHHIO strongly encourages OHFA to remove Montgomery and Summit counties from the ‘Balance of State Set Aside’ (like Cuyahoga, Franklin, and Hamilton counties are). This will enable more rural communities to more fairly compete for tax credits.

Tiebreaker Priorities

COHHIO strongly supports the use of the highest percentage of 30% AMI units as the first tiebreaker. The Gap report demonstrates that in Ohio there is an extreme shortage of affordable housing. The largest deficit is for extremely low-income household earning

less than 30% AMI, with only 40 units available for every 100 households. In comparison, there are 71 affordable units available for every 100 low-income household (50% or below AMI) seeking housing. In addition, 71% of ELI households in Ohio are severely cost burdened, paying more than 50% of their income on housing costs, in comparison to 25% of LI households.

COHHIO acknowledges that higher percentages of 30% AMI units present challenges to developers, however, these challenges are not insurmountable, especially for developers engaged in the community. These are not challenges well addressed by market-rate development, therefore a core target of the LIHTC principles. Efforts to incentive units at 30% AMI would make strides in addressing the vast affordable needs for these households.

Clarification on County Awards and Set-Asides

COHHIO would appreciate additional clarity on how regional and county-level limitations interact with set-aside allocations. The Gap report, produced annually by National Low Income Housing Coalition (NLICH) in conjunction with COHHIO demonstrates a shortage of all forms of housing in every county in Ohio. While we understand the intent of the new regional distribution methodology, we are still unclear on the implications of actual practice. Clear examples and scenarios on how county limit rules interact with multiple funding streams would improve predictability and avoid unnecessary confusion.

Thanks for your consideration of the above request and recommendation.

Sincerely,

A handwritten signature in black ink that reads "Amy M. Riegel". The signature is fluid and cursive, with the first name "Amy" and last name "Riegel" clearly legible. The middle initial "M." is written in a smaller, more compact script.

Amy M. Riegel
Executive Director