



July 31, 2025

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

RE: CSH's Comments on 2026 QAP

Dear Mr. Beagle:

CSH is grateful for the collaborative process that OHFA utilizes to develop its Qualified Allocation Plan. OHFA is clearly committed to its mission and the staff demonstrate that in all they do. CSH in partnership with the undersigned organizations wish to elevate the following concerns:

**Expanding the Service Enriched Pool to Other Populations**

CSH and the undersigned organizations recommend re-convening the state partners that created the *Ohio Interagency Council on Homelessness and Affordable Housing Permanent Supportive Housing Policy Framework* before any significant changes are made to the Service Enriched tax credit pool; given the amount of time and energy dedicated by the participants of the Framework group to creating the Framework, as well as the representation of many who are involved with OHFA's new populations, we feel that it is important to convene these stakeholders to make clear priorities for the use of these critically needed resources. It is 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.

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 populations without increasing the pool sufficiently to ensure at least as many PSH projects are awarded does not make sense.

CSH and the undersigned organizations recommend 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

## **Funding Pool Set Asides**

CSH and the undersigned organizations recommend that OHFA reinstate the previous definition of Balance of State- expanding the geographical definition that mirrors the Continuum of Care mapping. As noted above in light of the increase in homelessness across the state we also recommend OHFA commits to a minimum floor of PSH Policy Framework target populations in the limiting the Balance of State set aside to the PSH Framework Populations only.

## **Expert Recommendation: Support Documentation**

CSH and the undersigned organizations recommends OHFA require *additional* information in the Letter of Recommendation including the following:

- Funding resources that an expert entity has outlaid for supporting the target population and whether the proposed project would be able to apply for this funding if the project were built
- The expert has evaluated the proposed project's Service Plan, including the project's service provider and service plan budget and sources and agrees that the plan is reasonable and uses documented best practices and has a good chance for success
- The expert will either serve as a coordinated referral agency for the community to the project or support the project long-term by marketing the project and its units to the target population for no less than 15 years

Additionally, CSH and undersigned organizations recommend the Supportive Service Plan be due at initial application rather than final.

The success of supportive housing projects and the tenants it serves lives in part in an experienced provider's ability to provide robust and well-funded supportive services.

## **Neighborhood Opportunity Index: 40% of Total Score**

Supportive Housing development teams have experienced unprecedented levels of opposition in recent years. Coupled with local zoning issues, it is growing increasingly difficult to identify viable sites for supportive housing. The scoring criteria related to high opportunity areas, low poverty rates and low unemployment rates only add to the challenge. While we appreciate the intent of such scoring criteria, it does not honor the real time challenge of siting supportive housing projects as well as the fundamental difference between supportive housing and affordable housing. Affordable housing is rightly evaluated by market conditions for long-term feasibility while supportive housing operators are incentivized from their local Continuum of Care's and HUD to help tenants 'Move-On' when they no longer need the intense services that PSH provides. This speaks to the underpinnings of tenant success in supportive housing; access to robust and tenant centered services and key community amenities are primary to creating housing stability, not market conditions.

We request that transportation, access to basic amenities (including grocery stores with fresh food), medical and other services be the focus of location criteria. Accordingly, the criteria set forth puts rural and Balance of State proposals at a disadvantage as these communities categorically have higher rates of poverty and unemployment. Giving this category overly significantly weight at 40% of the total score overly values

conditions that do not actually help make supportive housing high quality; it only makes it significantly harder to site and be competitive.

### **Housing Needs Index: 35% of Total Score**

It is essential to connect competitive scoring criteria to the specific need for housing types. However, the need for supportive housing, particularly as outlined in the Interagency PSH Policy Framework, is not adequately captured through traditional housing needs analysis, such as OHFA's Housing Needs Index. We propose that OHFA have a Housing Needs Index score for the Special Needs Housing Pool that more accurately reflects the needs of the populations this pool serves. For example, data collected by Continuums of Care, such as the Point-In-Time (PIT) Count and the Housing Inventory Count (HIC) could be used to create state priorities for supportive housing development. For non-homeless populations included in the PSH Policy Framework, relevant data sources may also include County Developmental Disability Boards, child welfare systems, and supportive service providers for Transition-Aged Youth. We strongly recommend that any scoring related to supportive housing needs be based exclusively on data specific to the target population. Traditional market analyses—such as those used in mapping tools—do not reflect the unique and critical needs of these populations and should not be used as proxies.

CSH and the undersigned are eager to continue the conversation with OHFA to ensure that the path to create supportive housing through the 9% LIHTC program is deeply connected to the unique set of circumstances and challenges that supportive housing developers face.

Thank you in advance for your consideration.

Sincerely,



Leah Werner  
Director  
CSH, Ohio Office

## Supportive Housing Stakeholder Sign On

Corporation for Ohio Appalachian Development  
Megan Riddlebarger  
Executive Director

Coalition for Homelessness and Housing in Ohio  
Amy Riegel  
Executive Director

Community Housing Network  
Ryan Cassel  
Chief Real Estate Development Officer

Extended Housing, Inc.  
Karen McLeod  
Executive Director

ICAN Housing  
Julie Sparks  
Executive Director

HIT Foundation  
Clayton Genth  
Executive Director

Model Group  
Jennifer Walke  
VP Development

YWCA Hamilton  
Wendy Waters-Connell  
Executive Director