

Dear OHFA QAP Team,

Thank you for the opportunity to provide feedback on the draft 2026–2027 Qualified Allocation Plan. I appreciate the work that has gone into the revised QAP and respectfully submit the following questions and comments for your consideration:

1. Veterans as a Special Population

Has OHFA considered designating low-income veterans—particularly those experiencing or at risk of homelessness—as a standalone eligible population under the “Tenant Populations with Special Housing Needs” set-aside in the current QAP?

HUD recognizes veterans as a priority population across multiple federal programs. These include the HUD-VASH program, which provides rental assistance and supportive services to veterans experiencing homelessness; the Supportive Services for Veteran Families (SSVF) program, which helps veterans at risk of homelessness remain stably housed; and Continuum of Care (CoC) prioritization, which gives emphasis to veteran households in coordinated entry systems.

HUD policy and program guidance consistently identify veterans—especially those transitioning from homelessness—as a key population that state agencies can support through QAP tools such as set-asides, tenant selection preferences, or scoring incentives. Several state housing finance agencies, including West Virginia, Massachusetts, and Alaska, already award points or require unit set-asides for veteran-specific housing, demonstrating viable models for OHFA to consider.

Veterans often face housing access barriers when they do not meet additional eligibility criteria, such as disability status or Coordinated Entry documentation. Explicitly recognizing veterans as a distinct category—consistent with federal priorities and best practices from other states—would help ensure low-income veterans in Ohio are not unintentionally excluded from affordable housing opportunities.

Will OHFA reconsider its current stance and recognize low-income veterans as a special needs population in this QAP? If not, is there a documented rationale for excluding veteran status as a standalone eligibility category?

2. Housing Need Scoring

Does OHFA incorporate recent disaster-related impacts—such as FEMA disaster declarations, significant housing unit loss, or large-scale displacement—into its methodology for determining housing need or scoring priorities under the QAP?

For example, Logan County currently shows relatively low housing need on OHFA’s Opportunity Index maps, likely based on pre-disaster data. However, in 2024, a tornado caused widespread damage in parts of the county, including Lakeview, destroying homes and displacing numerous residents. This has significantly reduced the already limited supply of affordable housing in the area and increased demand for replacement units.

If recent disaster impacts are not currently factored in, would OHFA consider establishing a mechanism—such as score adjustments or supplemental points—for federally declared disaster areas or communities with a documented loss of housing stock? This could help ensure that resource allocation remains responsive to emergent local needs, particularly where low- and moderate-income households have been most affected.

3. County Limits and Use of CQLs

On page 33 of the QAP, OHFA states that it will “limit the number of awards in each county based on the higher of the most recent 5-year American Community Survey (ACS) county population data or the Projected 2050 County Populations as determined by the Ohio Department of Development’s Office of Research, adjusted for the number of applications receiving a CQL in the prior 9% LIHTC round.”

Could OHFA explain why the number of prior-year CQLs is used as an adjustment factor in this formula? This approach can lead to counties with smaller populations receiving a larger number of awards, while more populous or higher-need counties receive fewer.

Why was this CQL-based adjustment included in the methodology, rather than relying solely on current population or documented housing demand? Has OHFA considered using a formula that allocates based only on ACS population data or a weighted housing needs index? If not, can OHFA provide its rationale for including prior CQL counts and how that aligns with program goals of equitable, need-based resource distribution?

Thank you for considering these questions. I look forward to any clarification you are able to provide.

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