
OHFA QAP Comments

From Mayor Office <mayor@cityofbryan.com>

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To QAP, OHFA <QAP@ohiohome.org>

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Good afternoon,

Thank you for the continued dedication and attention the Ohio Housing Finance Agency (OHFA) gives to addressing housing needs across the State of Ohio.

As the mayor of a community in Williams County, I want to reiterate the challenges we've communicated—both through data and real-world experience—regarding the difficulty of attracting qualified builders willing to assume the financial risks associated with developing housing in rural Ohio.

We respectfully ask that the playing field be leveled. Specifically, we urge OHFA to ensure that rural funding set-asides are directed exclusively to rural communities, and that the amenity maps used in project evaluations be updated immediately to reflect accurate, current data. These changes are essential to give communities like ours a fair opportunity to compete for the 9% LIHTC credits.

Below are key comments and considerations I respectfully submit regarding the most recent Qualified Allocation Plan (QAP).

Neighborhood Opportunity Index and Rural Housing Equity

The proposed Neighborhood Opportunity Index (NOI) threshold outlined in the draft QAP poses a significant barrier to housing development in rural counties such as Williams County, Ohio—as well as broader Appalachian regions. While we recognize the underlying intent of the NOI—to encourage development in high-opportunity areas—its current implementation imposes unintended and inequitable consequences for communities already struggling to attract investment.

Williams County, with a population of approximately 36,000, is classified as rural by ODOT, HUD, and USDA. It faces a critical shortage of affordable housing, evidenced by historically low vacancy rates, long waitlists for subsidized units, and rising demand for workforce housing due to regional growth in manufacturing and logistics. Despite these needs, nearly all census tracts in the county fall below the regional NOI median score calculated by OHFA—making us ineligible under the proposed scoring rubric, regardless of project strengths such as site control, local support, or readiness to proceed.

The policy does not reflect the unique conditions of rural communities, including limited transit, lower-density development, and reduced access to walkable services—factors which heavily influence NOI metrics. Yet these areas face precisely the housing challenges LIHTC was created to address.

Additionally, embedding this NOI threshold in the “Competitive Scoring” section (page 48) instead of listing it as a clear eligibility requirement results in confusion and reduces transparency. Applicants risk investing significant time and resources into planning only to discover late in the process that their projects are automatically disqualified based solely on tract location.

We urge OHFA to revise this threshold requirement and consider the following alternatives:

- 1. Eliminate the NOI Threshold as an Eligibility Cutoff** Retain NOI as a scoring factor, but do not use it to disqualify projects outright. Under the current QAP, Williams County's census tracts fall well below the rural median defined by OHFA's interactive map and statewide Urban-Suburban-Rural (USR) methodology. This

rigid median threshold renders nearly the entire county ineligible, stalling housing development where it's most needed.

2. Introduce Rural Exemptions or Adjustments For non-metropolitan counties like Williams, the NOI calculation fails to reflect real housing need or feasibility. Under the current draft QAP, no 9% LIHTC projects could apply in Williams—regardless of merit. This reverses prior QAP cycles, where lower scores presented challenges but did not make projects ineligible. The implications are profound:

- *Housing stagnation*: Continued shortages for workforce and senior populations.
- *Opportunity inequality*: Rural residents miss out on affordable rentals despite clear housing stress.
- *Developer deterrence*: The scoring system steers proposals toward urban tracts, deepening geographic divides.

3. Create Transparent Pathways for Alternative Compliance Projects in lower-NOI tracts may align with local housing plans, revitalization efforts, or demonstrate other compelling merits. However, the QAP's structure hides the true impact of NOI scoring, treating it as a silent eligibility filter under competitive scoring. Applicants deserve clear guidelines at the outset.

Conclusion

Rural Ohio communities like Williams County face real and growing housing needs. Affordable housing must be distributed equitably across the state—not dictated by rigid index formulas or obscure mapping tools. We respectfully request that OHFA amend the draft QAP to allow for balanced, inclusive development practices and ensure that communities are not disadvantaged solely due to geography.

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