



City of Cleveland Memorandum  
Justin M. Bibb, Mayor

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To: Matt Sutter  
Senior Director of Housing Programs

From: Alyssa Hernandez,  
Director, Department of Community Development

Subject: 2026-2027 Draft QAP

Date: 7/31/2025

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The City of Cleveland appreciates the continuation of this two-year QAP model, as it provides predictability for our development partners and place-based organizations. This helps us to further our efforts in neighborhood development, planning, and strategy. We are especially thankful for this opportunity to provide feedback on the 2026 and 2027 Draft QAP, as it gives us the opportunity to advocate for the types of projects we would like to see in our neighborhoods.

I am writing to express our concern regarding the threshold criteria set forth in the 2026–2027 Draft QAP. Based on our review of the General Occupancy and Senior Occupancy minimum threshold requirements, we are concerned that this QAP risks perpetuating a longstanding legacy of disinvestment and exclusion in many Cleveland neighborhoods.

From our review, we are particularly concerned with any criteria that prioritize census tracts based on an assessed value of opportunity and access. While the intent behind these assessments is commendable, we are concerned that relying primarily on historical data fails to reflect current strategic initiatives and planned investments. As you understand, the availability of LIHTC funding is a critical tool for community development across Ohio. In many cities, including Cleveland, prioritizing census tracts based on outdated indicators of “opportunity” often steers investment toward communities that have historically benefited from preferential housing policies and greater access to public and private investment. Unfortunately, the proposed minimum threshold requirements effectively exclude most of the City of Cleveland and instead favor more affluent suburbs. In fact, many of the suburbs excluded under these thresholds are middle-class communities that have historically faced barriers to investment and access to opportunity.

As proposed, the current QAP will reinforce patterns of investment that advantage already well-resourced neighborhoods while denying access to quality housing in communities that have been historically marginalized. We are concerned that this QAP may have the following effects:

- Continued investment in higher-income neighborhoods, further widening the gap between growing and stagnant communities
- The effective exclusion of entire neighborhoods from benefiting from the State’s program
  - This is critically important as all communities are facing a housing crisis



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- The sidelining of place-based partners from participating in the program — and from receiving critical developer fees to sustain their operations — because they serve historically underserved communities

Further, as drafted, this QAP will reduce the number of “tools” available to the City of Cleveland to strategically reinvest in long-neglected neighborhoods. This comes at a time when Cleveland has committed \$15 million to reinvigorate a historically Black, middle-class neighborhood on the city’s Southeast Side and is pursuing a historic partnership with the Cleveland Metropolitan School District to repurpose and redevelop dozens of underutilized school buildings. Under the proposed QAP, neither of these transformative initiatives would be eligible to leverage 9% LIHTC support.

Respectfully, we request reconsideration of the threshold requirements and scoring process outlined in the Draft QAP. We believe the following modifications would allow for a more equitable allocation of the State’s housing resources:

- Reinstating a municipally driven process, such as FhAct50, that allows local governments to define geographies eligible for OHFA approval of 1–3 projects, provided those projects meet OHFA underwriting criteria
  - This would empower OHFA to intentionally align its resources with local strategic investments
- Allowing the Mayors of Cleveland, Cincinnati, and Columbus to provide written support for up to three projects in areas that do not meet the General or Senior Occupancy thresholds, enabling those projects to compete more effectively
- Giving consideration to projects located in geographies that have not received a LIHTC award in the last five years

The City of Cleveland is grateful for OHFA’s past investments in our communities. We view the 2026–2027 QAP as a testament to your commitment to transparency and thoughtful policy.

Thank you for the opportunity to provide input on this important document.

Respectfully,

A handwritten signature in black ink, appearing to read "Alyssa Hernandez", with a stylized flourish at the end.

Alyssa Hernandez  
Director, Department of Community Development