

August 1, 2025

Matt Sutter
Senior Director of Housing Programs
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

Re: 2026-2027 Draft QAP Comments

Dear Mr. Sutter:

On behalf of the Cuyahoga Metropolitan Housing Authority (CMHA), thank you for the opportunity to comment on the first draft of the Program Year 2026–2027 *9% LIHTC Qualified Allocation Plan (QAP)*. We appreciate your on-going engagement with stakeholders and thank you for your consideration of our feedback.

CMHA's mission is to create safe, quality, affordable housing opportunities and improve the quality of life for the communities we serve. As one of the largest housing authorities in the country, CMHA owns over 10,000 affordable housing units across 60 properties, serving over 55,000 residents in Cuyahoga County. One component of CMHA's scope is the implementation of strategic real estate development transactions utilizing various U.S. Department of Housing and Urban Development (HUD) programs. These federal programs award funding to redevelopment initiatives founded on strategic planning efforts developed in collaboration with local, city, county, and state partners to revitalize and transform distressed public housing and catalyze reinvestment in the surrounding neighborhoods.

In our review of the 2026-2027 draft QAP our agency has concerns regarding the proposed threshold criteria for the 9% Low Income Housing Tax Credit Programs. This includes the proposed General Occupancy and Senior Occupancy Minimum Threshold within the Neighborhood Opportunity Index scoring criteria. The "General Occupancy Minimum Threshold" layer reveals that the City of Cleveland and many surrounding communities are below the threshold and therefore barred from participating in the 9% Low Income Housing Tax Credit Program. This severely limits project eligibility in communities with revitalization priorities where CMHA's mission to provide safe, quality, affordable housing opportunities are in the greatest need.



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We would respectfully ask that the scoring criteria of the threshold requirements and scoring process outlined in the Draft QAP be re-evaluated and revised to allow for a more equitable allocation of the State's much-needed housing resources. Considerations may include:

- Instituting a municipally driven process that allows local governments to define geographies eligible for project consideration based on local investment goals;
- Allowing mayors of major cities whose neighborhoods are largely or fully excluded from meeting General of Senior Occupancy thresholds to support a defined number of projects without meeting these threshold requirements to remain in competition for the 9% tax credit awards; or
- Considering projects located in geographies that have not received a 9% LIHTC award in the last five years.

OHFA has a stated vision of "an Ohio where everyone has a safe, decent, and affordable place to call home." CMHA shares these values and is committed to partnering with OHFA to ensure the QAP supports the production of affordable housing to benefit low-income Ohioans throughout the state. Thank you for the opportunity to provide input on this critical resource to meet the housing needs of our fellow Ohioans.

Sincerely,



Jeffrey K. Patterson
Chief Executive Officer



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