



August 1, 2025

Cody Price  
9% Tax Credit Section Chief  
Ohio Housing Finance Agency  
2600 Corporate Exchange Drive, Suite 300  
Columbus, Ohio 43231

Re: *Recommendations for consideration for the 2026-2027 9% LIHTC QAP*  
*Sent via electronic mail to: [QAP@ohiohome.org](mailto:QAP@ohiohome.org)*

Dear Mr. Price:

On behalf of Enterprise Community Partners ("Enterprise"), we are pleased to submit these comments regarding the Ohio Housing Finance Agency's ("OHFA") LIHTC Program and 2026-2027 9% Qualified Allocation Plan ("QAP").

Enterprise is a national nonprofit whose mission is to make home and community places of pride, power, and belonging for all. To make that possible, we operate the only organization designed to address America's affordable housing crisis from every angle: we develop and deploy programs and support community organizations on the ground; we advocate for policy on a nonpartisan basis at every level of government; we invest capital to build and preserve rental homes people can afford; and we own, operate, and provide resident services for affordable communities. With this end-to-end approach, 43 years of experience, and thousands of local partners, Enterprise has built and preserved over 1 million affordable homes and invested \$80.9 billion in homes and communities across the country, including over \$12.6 billion in Ohio that has helped create or preserve over 160,500 affordable homes.

Thank you for the opportunity to provide comments to the QAP. We appreciate OHFA's collaborative and inclusive approach and respectfully offer the following comments and recommendations.

### **Opportunity and Housing Needs Index**

Historically, OHFA has had competitive pools catering to specific project types, such as New Construction, Preservation, and Permanent Supportive Housing. The current draft of the QAP shifts from this model and proposes 75% of competitive scoring based on Opportunity and Housing Needs Index mapping. Our concern is that this approach may exclude entire communities from affordable housing investment. We know the need for housing across the state is significant and investing in areas that are deemed "high opportunity" will exclude communities that are in dire need of housing.

In addition, the needs of each housing market are local, but the maps use broad federal data that may not appreciate the needs or intricacies of communities or neighborhoods. This model will create a challenge for mission driven developers and the populations they serve. The shift from



project-type pools to regional pools does not fully consider the purpose of projects or long-term community impact. We urge OHFA to reconsider this approach and reinstate policy-based pools.

### **Green Building Certification**

OHFA has demonstrated a commendable dedication to sustainability and environmental responsibility within the affordable housing industry. Enterprise applauds OHFA for continuing to include a threshold requirement for sustainable design and construction standards in the QAP. Over the course of more than a decade, OHFA's endorsement of Enterprise Green Communities in the Ohio QAP has set a precedent for promoting sustainable best practices.

Green building standards help to ensure that projects funded by Housing Credits will not only create new housing opportunities, but ensure that people living in affordable housing are healthier, spend less money on utilities, and have more opportunities through their connections to transportation, quality food, and healthcare systems. These standards also support responsible stewardship of this public investment by producing projects that are efficient, durable, resilient, and healthy – providing maximum value for investment.

Ohio has had long-standing success as an early adopter of Enterprise Green Communities, going as far back as 2008 when 10% of all certified projects to the original 2008 Criteria were in Ohio. Currently, 27% (389) of all projects certified to Enterprise Green Communities since the onset of the program are located in Ohio. In the time since OHFA has made green building certification a threshold criteria for LIHTC awards, 174 projects were certified to the 2015 Criteria, 22 are certified to the 2020 Criteria, and there are 43 in that certification pipeline. Enterprise will be launching a 2026 revised Criteria at the end of this year, celebrating the 20<sup>th</sup> anniversary of the standard, and we look forward to a continued strong partnership with OHFA for creating and preserving quality homes for the most vulnerable Ohio residents.

Third-party verified green certification ensures energy-efficient housing – through a building science systems approach including building to lower energy demands; right-sizing systems; and installing efficient, durable equipment. Historically, families residing in low-income multifamily housing experience disproportionately high energy burdens. Energy-efficient housing can help lower those utility bills. Energy-efficient homes are also more durable and less vulnerable to extreme weather events. The CDC reports<sup>1</sup> that heatwaves are the deadliest of the climatic disasters facing cities, which affect low-income and people of color the most.

According to a 2020 study by the American Council for an Energy-Efficient Economy (ACEEE)<sup>2</sup>, 67% (25.8 million) of low-income households ( $\leq$  200% of the federal poverty level [FPL]) face a high energy burden (paying more than 6% of income on energy bills) and 60% (15.4 million) of those face a severe energy burden (paying 10% or more). Households with high energy burdens are more likely to stay caught in cycles of poverty – a recent study showed energy-burdened

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<sup>1</sup> [www.cdc.gov/climateandhealth/pubs/extreme-heat-guidebook.pdf](https://www.cdc.gov/climateandhealth/pubs/extreme-heat-guidebook.pdf)

<sup>2</sup> 'How High Are Household Energy Burdens?' September 2020 by the American Council for an Energy-Efficient Economy



households have a 175–200% chance of remaining in poverty for a longer period of time, as compared to non-energy-burdened households.<sup>3</sup>

### **Additional Comments**

We commend OHFA for including the provisions in Page 19, focused on Extended Use Agreement. Enterprise strongly supports this section. This language will effectively close the qualified contract loophole in Ohio; nationally, this loophole has led to the premature loss of between 6,000 – 10,000 affordable units annually, or over 115,000 cumulatively nationwide. Enterprise strongly recommends that this section remain unchanged in the final 2026-2027 QAP.

We further commend OHFA for incorporating HUD's Guidance on *Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions*. This is an important step towards expanding access to housing.

Thank you again for the opportunity to comment on the 2026-2027 9% LIHTC QAP, and for your continued work to address housing affordability in Ohio. Enterprise looks forward to continuing to partner with OHFA. Please do not hesitate to contact us with any questions at: [adonald@enterprisecommunity.org](mailto:adonald@enterprisecommunity.org) or [hremesch@enterprisecommunity.org](mailto:hremesch@enterprisecommunity.org).

Respectfully,

A handwritten signature in black ink that reads "A. Blue Donald".

Ayonna Blue Donald  
Vice President, Ohio Market Leader

A handwritten signature in black ink that reads "Hazel G. Remesch".

Hazel G. Remesch  
Director, Ohio State and Local Policy

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<sup>3</sup> Bohr, J., and A. McCreery. 2019. "Do Energy Burdens Contribute to Economic Poverty in the United States? A Panel Analysis: "Social Forces" November 16. [www.doi.org/10.1093/sf/soz131](https://www.doi.org/10.1093/sf/soz131)