
2026-2027 QAP Comments

From Westrich, Janet <jwestrich@ERSLIFE.ORG>

Date Fri 7/25/2025 5:22 PM

To QAP, OHFA <QAP@ohiohome.org>

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Good afternoon,

Thank you for the opportunity to provide feedback on the First Draft 2026-2027 9% LIHTC QAP.

Episcopal Retirement Services would offer the following thoughts:

1. Many developers who have been developing affordable housing in Ohio for decades, have significant portfolios of aging communities in need of re-syndication. We appreciate the emphasis on utilizing the 9% credit to develop new units and increase housing supply, but *we are concerned that awarding only one preservation deal per region will eventually harm the existing supply of affordable housing*. While the 4% credit plus bond gap financing can be an option, this route often does not provide enough capital for the substantial critical needs of an aging community in need of preservation.
2. The minimum threshold for Neighborhood Opportunity Index is a concern. While we understand and appreciate the policy goal of awarding funds to neighborhoods where residents are likely to thrive, we are concerned about unintended consequences of eliminating many neighborhoods in Ohio.
 - a. This minimum threshold is harmful to preservation deals, which may receive supportive services, quality management, and provide critical housing despite not being located in Areas of Opportunity.
 - b. Further, while we appreciate the thoughtful creation of the Indices, we do not feel it is possible to capture every factor that impacts resident success in such an index. We at ERS have been working with several neighborhood CDCs in areas that strongly desire affordable housing for their senior residents to age in place, but that do not meet the minimum Opportunity Index. One such neighborhood has been working to develop senior housing for almost a decade, having stated this goal in their Neighborhood Plan. This neighborhood features an active CDC, intentional diversity, a wealth of community programming, a thriving arts center, and home values steadily increasing. As a senior housing provider, our mission aligns with this neighborhood's goals, yet the neighborhood does not currently meet the minimum Opportunity Index. We fear this is just one of many examples where neighborhoods welcoming and eager to provide affordable housing will be ruled out by the minimum Opportunity Index threshold.
 - c. We fear the heavy emphasis on Areas of Opportunity will drive new construction into areas where sites will likely cost significantly more, thus adding to overall deal cost and reducing the total number of deals likely to be funded.
3. Lien and Litigation reports are listed as a requirement under (14) Experience and Capacity Review and they are also listed separately under (20) Lien and Litigation reports and marked as due at final application. Can OHFA please clarify when these will be due?
4. Can OHFA add more clarity to funding priorities? Despite reading closely, I'm still a bit confused about how the set-asides and regional scoring come into play together.

Thank you again for the opportunity to send feedback.

Janet Westrich

Janet Westrich | Development Project Manager



Pronouns: She/Her/Hers



Hear my name

3870 Virginia Ave. | Cincinnati OH 45227
513-979-2240

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