



August 1, 2025

The Ohio Housing Finance Agency
Development Division
57 E. Main Street
Columbus, Ohio 43215

Sent electronically: QAP@ohiohome.org

Dear Multifamily Development team:

On behalf of Home Innovation Research Labs, I am pleased to submit comments regarding The Ohio Housing Finance Agency's Draft 2026-2027 QAP.

We offer the following points for your consideration:

- Praise for requiring third-party green building certification for all new construction projects;
- Praise for recognizing NGBS Green Certification; and
- Recommendation to incentivize higher levels of green building certification and net zero energy achievement.

Praise for Green Building Criteria

We praise OHFA for retaining third-party green building certification as mandatory for new construction projects. This requirement ensures that efficiency, comfort, and a healthy living environment will be implemented consistently across newly funded construction projects.

Comprehensive green building standards support true housing affordability and ensure that funded buildings are designed to support the comfort and health of residents. Further, by recognizing multiple green building rating systems, OHFA is empowering applicants to pursue their program of choice. We respectfully request that these options be retained in the final QAP.

In particular, we commend OHFA for recognizing NGBS Green certification based on the *ICC-700 National Green Building Standard (NGBS)*. The NGBS was specifically designed for residential projects and is affordable to implement, making it ideally suited for low-income housing programs.

Competitive Points for Higher Performance

Furthermore, we encourage OHFA to incentivize higher levels of green building certification through a tiered point system, with competitive points available for higher certification levels and high-

performance labels. This approach would guide development teams toward more energy-efficient, resilient, and sustainable construction, aligning with the agency’s guiding principles for quality housing and long-term asset management.

One option is for OHFA to offer competitive points to project that achieve advanced green certification levels, such as Gold and Emerald level under the NGBS Green certification program. Each ascending level requires projects to implement additional strategies across multiple sustainability categories—including energy efficiency, water conservation, indoor environmental quality, and resource efficiency. Achieving a higher certification level under the NGBS requires earning more points in every chapter of the standard, resulting in measurable performance gains. Overall, each step up yields a 5-7.5% improvement in energy performance¹.

Alternatively, OHFA could award competitive points to projects that achieve a net zero energy recognition from the green certification programs recognized in its Design and Architectural Standards. These designations signal that a building is designed to consume only as much energy as it produces onsite through renewable energy generation or purchase. Net zero buildings dramatically reduce energy loads through integrated design, high-performance envelopes, and efficient mechanical systems – delivering long-term operational savings, improved housing resilience, and reduce the energy burden of low-income residents.

Designations to include:

- NGBS Green+ NET ZERO ENERGY certification²
- Enterprise Green Communities Plus
- LEED Zero Energy

Importantly, these net zero energy recognitions are optional “add ons” to existing green building programs already familiar to development teams. This provides a streamlined, low-friction pathway to higher performance, as developers can continue working within a program that they already understand—accessing technical assistance and leveraging existing relationships with program staff.

Home Innovation Research Labs

Home Innovation Research Labs serves as Adopting Entity and provides certification services to the NGBS. Home Innovation Labs is a 61-year old, internationally-recognized, accredited product testing and certification laboratory located in Upper Marlboro, Maryland. Our work is solely focused on the residential construction industry and our mission is to improve the affordability, performance, and durability of housing by helping overcome barriers to innovation. Our core competency is as an independent, third-party product testing and certification lab, making us uniquely suited to administer a green certification program for residential buildings. Our staff is made up of mechanical, structural, and

¹ For more information, see the energy comparison charts at www.NGBS.com/CompareNGBS

² For more information on NGBS Green +NET ZERO ENERGY, visit www.NGBS.com/NGBSGreenPlus.

electrical engineers; planners; economists; architects; former builders, remodelers, and contractors; lab and technicians. Combined, they possess an unparalleled depth of knowledge and experience in all facets of market analysis and building science research and testing. Why is that important? Because behind every building seeking NGBS compliance stands a team of experts on a mission to help them succeed. Participation in NGBS Green brings our building science expertise to each project team at no additional cost.

QAP Recognition of the NGBS

The National Green Standard is currently recognized in nearly 30 states Qualified Allocation Plans (QAPs), and an increasing number of State Housing Finance Agencies have been adding NGBS green certification to their QAPs to help promote green affordable housing. In these plans, NGBS is recognized as on-par with comparable programs, such as LEED and Enterprise Green Communities, and other regional programs, such as Earth Advantage. Multifamily builders who utilize NGBS for low-income housing tax credits typically receive the same number of points for NGBS as they would for an alternative program. The straight-forward and low-cost nature of the NGBS certification program make it ideally suited for affordable housing development, and this is evident by the number of Habitat for Humanity organizations and other LIHTC providers who select NGBS as their program of choice.

Summary

Thank you for the opportunity to provide feedback on Ohio's Draft 2026-2027 QAP. We applaud OHFA for requiring third-party, green building certifications. We also recommend that OHFA incentivize higher levels of green building certification through a tiered point system with competitive points available for higher certification levels and high-performance labels.

I am happy to meet with you or your staff should you require a more detailed overview of the NGBS or our certification program. I will also gladly send you any supplemental information that you might require. Please do not hesitate to contact Michelle Foster (mfoster@homeinnovation.com, 301-430-6205), our vice president of Sustainability, directly if she can be of further assistance.

I look forward to working with you to promote green certified affordable housing in Ohio.

Sincerely,



Michael Luzier
President & CEO