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LeadingAgeOhio.org

July 29, 2025

Director William Beagle
Ohio Housing Finance Agency
Office of Multifamily Housing, Development Division
2600 Corporate Exchange Dr., Suite 300
Columbus, OH 43231

Director Beagle;

Thank you for the opportunity to comment on the 2026-2027 Qualified Allocation Plan for 9% Low Income Housing Tax credits. LeadingAge Ohio is an association of aging services organizations, comprising roughly 350 providers statewide. While we primarily represent healthcare organizations, affordable senior housing makes up nearly 40 percent of member communities. Our members are operators of housing, as well as developers and service providers. Their goal is to ensure older Ohioans may age with dignity in a place they call home, whether that is in a private residence, healthcare facility or congregate senior housing.

The Low-income Housing Tax Credit program remains Ohio's most powerful mechanism for increasing affordable housing, and its importance grows amidst the deepening housing crisis.

Restructuring to prioritize location

The most significant change to the qualified allocation plan is the restructuring of scoring such that many criteria that previously received points are now considered "threshold" requirements. While we agree that location is of paramount importance and support OHFA's desire to support development across the buckeye state, we question whether it should be the only factor guiding selection.

Service Coordination

We are concerned that OHFA removed the requirement that service coordination be offered by a CORES-certified entity or by a licensed social worker employed by an Area Agency on Aging. LeadingAge Ohio has been an advocate for rigor in the service coordination requirement, to ensure that the organization is truly committed to and not just promising as a bid for points.

Furthermore, we believe that the presence of a skilled service coordinator conveys such value to resident quality of life, that it should be elevated above other amenities, similar to how broadband infrastructure is now a requisite rather than an optional amenity. That said, we would only support this elevation if doing so would not disadvantage senior projects—specifically, if there were a requirement similarly rigorous for general occupancy projects, that also might be elevated in importance.

Finally, OHFA typically requires developers to request permission if they plan to spend in excess of \$250 per unit per month on service coordination. We believe this should be flipped: that operators should feel

free to invest in this important support for residents, and that they should need to apply for special permission only if they plan to spend below this threshold.

Parity between General Occupancy & Senior

In the draft earlier this year of the Ohio Low-income Housing Tax Credit guidelines, projects were planned to be allocated according to population rather than need, such that only 30 percent of awards would go to senior housing projects. This QAP proscribes only 40 percent to senior projects. In the past, we've seen parity between senior projects and those for the general population, because older adults are at such increased risk of housing burden / homelessness due to fixed incomes. We'd appreciate this being amended in the second draft of the QAP to offer 50/50 parity between these populations.

Consistency in QAPs

LeadingAge Ohio is grateful for OHFA's openness to feedback and collaboration in the operation of its LIHTC programs. Indeed, we know from our counterparts in other states that their state housing agencies infrequently update guidance and are minimally responsive to their advocacy. That said, the significant changes we've seen every two years challenge stakeholders' ability to plan for the future. LeadingAge Ohio supports goalsetting over longer spans of time rather than each QAP being built in response to the two years that preceded it.

LeadingAge Ohio encourages OHFA to reconsider service coordination requirements in its 2026-2027 9% LIHTC Qualified Allocation Plan, and looks forward to clarifications on the importance of senior housing. We appreciate your willingness to accept the feedback and look forward to continued discussion and partnership.

Thank you for your consideration of our comments.

Kind regards,

A handwritten signature in cursive script, appearing to read "Susan V. Wallace".

Susan V. Wallace
President/CEO