



August 1, 2025

Cody Price  
Ohio Housing Finance Agency  
2600 Corporate Exchange Drive, Suite 300  
Columbus, OH 43231

Dear Dr. Price:

This letter provides feedback on Draft 1 of the 9% LIHTC Qualified Application Plan. As always, OCCH and our investor and development partners are grateful for OHFA's commitment to rigorous public process and to seeking input and dialogue with stakeholders. In particular, the process for this year's QAP process has invited continuous input and engagement.

Additionally, we are grateful that OHFA is maintaining the convention of a two-year QAP, which has been a good faith policy by OHFA for many years, recognizing that the effort to identify sites, secure site control, obtain entitlement approvals, engage the community, and perform due diligence is an enormous and expensive undertaking. The knowledge that 9% proposals will be subject to substantially similar criteria for two years – that there will be “two bites at the apple” – encourages developers to pursue more housing developments in more places. It serves the state well.

In the spirit of pursuing policies and programs that deliver the best housing outcomes for Ohio, we submit the following comments to Draft 1, in order of priority:

1. ***We recommend the elimination of the Neighborhood Opportunity Index Minimum Threshold.*** This threshold is a drastic change to longstanding state policy that has always encouraged quality housing proposals in all parts of the state and has the direct impact of categorically eliminating half of Ohio communities from eligibility for each pool.
  - There are seven entire counties (Adams, Brown, Clinton, Fayette, Holmes, Meigs, Morgan and Morrow) ineligible to apply for new affordability for families/general occupancy.
  - There are nine entire counties (Adams, Brown, Fayette, Holmes, Meigs, Monroe, Morgan, Paulding, and Pickaway) ineligible to apply for new affordability for seniors. One in five people in those counties are over 65.
  - In metropolitan and urban areas, very large areas are ineligible – many of the same areas that have experienced exclusion from public investment for decades.

Practically, there is no need for the minimum threshold; the emphasis on Opportunity Index scores achieves OHFA's policy objective without making half of Ohio's communities ineligible.

2. ***We recommend reducing the overreliance on indexed location scores that should be balanced with other project-specific criteria.*** Attempting to quantify access to opportunity is an interesting and informative exercise that can inform policy. But it is best when it is complementary to other criteria, recognizing the limits of drawing specific conclusions about the quality of life in a new development based on the abstract formulas. OHFA has always sought to put *affordability* in locations where it is scarce, yes. But it has also always sought to put *quality housing* in locations where it is not. This draft eliminates that possibility.

As a practical matter, this focus on location-based scoring will continue to have problematic outcomes, in motivating developers to pursue projects in the highest-scoring census tracts, which means this QAP will almost certainly steer OHFA resources to the same communities that have received multiple LIHTC awards in recent years.

Generally, we recommend that OHFA not have indexed location scores outweigh other important proposal attributes. In addition to being more inclusive of all Ohio communities, it will encourage innovation at the project level.

3. ***OHFA should re-consider the policy of awarding increasingly smaller competitive sub-pools.*** OHFA has been clear in its intent to make scoring more predictable and that goal is achieved by this QAP. But predictable scoring is not the same thing as predictable outcomes, and housing practitioners will be challenged to make informed decisions about their award chances under this QAP. Through the QAP's extensive use of regional allocations, sub-regional allocations (metro/rural), funding pools by project type and population, set asides, and county limits, the reality is that scoring is less of an award predictor than the random probability of how many other applications came in that same small region/sub-region/funding pool/county.

With only 20-23 awards made in a round, OHFA should reconsider the compartmentalization of many sub-pools and let more projects compete statewide so that a good score is a better indicator of the potential for an award. OHFA can and should continue to complement competitive scoring with strategic initiatives or set asides to ensure regional balance.

4. ***We recommend better alignment with community revitalization efforts.*** Concerted Community Revitalization Plans embody local priorities, and we support OHFA's recognition of them as a state funding priority. However, another problematic impact of the Neighborhood Opportunity Minimum Threshold is its conflict with these efforts.

For example, Ohio has nine varied communities with finalized Transformation Plans in the HUD Choice Neighborhoods (CN) program:

Steubenville North, Steubenville  
Renew Miami, Dayton  
Southside Gateway, Lorain  
West End, Cincinnati  
Woodhill, Cleveland

Junction, Toledo  
Cedar, Cleveland  
Bronzeville, Columbus  
Avondale, Cincinnati

While CN isn't the only way Concerted Plans are created, it is an example of a model program with robust community engagement, comprehensiveness, and leverage funding. None of these communities meet the Opportunity Index Minimum Threshold and they will all be ineligible for OHFA resources.

5. ***We recommend removing Building, Unit, and Lifestyle Amenities as Threshold criteria.***

We advise against policy that adds cost to housing development as a requirement. Amenities are an opportunity for project differentiation and innovation that meet resident and market needs and are best utilized as competitive criteria.

6. ***We recommend Lien and Litigation Reports be a requirement at Final Application only.***

While financial partners perform our own diligence on all project participant entities, we understand OHFA's public purpose in requiring lien and litigation reports – but requiring them at preliminary application imposes a cost and time burden for both developer and OHFA staff, and the review is stale by the time the project becomes fully formed. We recommend they are performed later in the process at Final Application.

Thank you for the opportunity to provide these comments and we look forward to ongoing engagement with OHFA as the QAP develops further.

Sincerely,



Jeff Beam

EVP of Acquisitions