



## OHIO HOUSING AUTHORITIES CONFERENCE

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July 31, 2025

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

Dear Mr. Price,

The Ohio Housing Authority Conference (OHAC) would like to thank you for continually seeking public input for the 2026-2027 9% LIHTC Qualified Allocation Plan. We appreciate that you incorporated feedback from stakeholders like OHAC, and we would like to take this opportunity to provide feedback on the first draft.

We recommend that the QAP not exclude all census tracts that fall below the regional median Neighborhood Opportunity Index. Low scores for these census tracts would mean it unlikely that properties in these tracts could be funded, but on principle and for consideration of precedent for future policy, we do not think such a large number of census tracts be automatically excluded. Consideration of a transformative project in a low-scoring tract should be allowed.

We know that some large developers are opposed to tiebreakers that consider ELI populations and rent subsidy, but we believe that policy should favor properties that reach more of the most vulnerable population. At the public forum, concern was expressed about the long-term viability of ELI units. While we do not feel that it is necessary, one way to address that concern would be to make the tie-breaker ELI units with project-based subsidy.

We appreciate that OHFA introduced "Housing Needs Index" as a second scoring criteria in addition to Neighborhood Opportunity Index, but we are concerned that the scoring is still too Place-Based and leaves some populations behind. We will continue to work with OHFA into the future to come up with additional approaches to scoring and funding. We are extremely appreciative of the set-aside for two awards to QCTs with Concerted Community Revitalization Plan. We look forward to continuing discussions about developing policy that benefits vulnerable populations in existing struggling communities. Given the need for ongoing discussion about place-based scoring, we ask that OHFA consider making the QAP valid for one year only and do a revisit after one year.

For the Community Impact Strategic Set Aside, we encourage OHFA to give itself more flexibility by changing the preference to read if "they meet a quantifiable need and target policy and / or geographic areas left underserved through competitive selection process."

Given the scarcity and the value of the 9% credits, we continue to recommend that LIHTC reindications not be permitted to compete for 9% credits. Resyndications should pursue 4% credits with bonds and potentially bond gap funding. There remain too many aging properties with great need, and it does not seem good policy to prioritize projects that received valuable 9% credits as recently as 20 years ago. It seems incomprehensible that a 20-year-old 9% property can compete more competitively than an undercapitalized public housing property built over 75 years ago.

Finally, we want to reiterate our admiration for OHFA's continued approach to seek public policy. We really appreciate OHFA's commitment to develop the best policy to create affordable housing opportunities. Thank you.

Sincerely,

*Judy Carlin*

Judy Carlin

OHAC President

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