

July 31, 2025

Mr. Bill Beagle, Executive Director
Ohio Housing Finance Agency
2600 Corporate Exchange Drive, Suite 300
Columbus, OH 43231

RE: Comments on the Draft 2026-2027 QAP

Dear Mr. Beagle:

I am writing on behalf of the Ohio Balance of State Continuum of Care (Ohio BoSCoC), the federally recognized homeless response system that is comprised of Ohio's 80 rural and suburban counties. I serve as the CoC Director for the Ohio BoSCoC, leading the system planning and coordination work. I appreciate the opportunity to provide comments on the 2026-2027 QAP.

Although the Ohio BoSCoC is made up of largely rural communities, our CoC has continued to struggle with reducing homelessness, like many of our urban CoC counterparts. Most recently we reported a 5% increase in our 2025 count of people experiencing literal homelessness, as compared to 2024's annual Point-in-Time Count (PIT Count). As OHFA well knows, Permanent Supportive Housing (PSH), the development of which is supported through the 'Tenant Populations with Special Housing Needs' pool (formerly called the Service-Enriched Pool), is the most effective tool to end homelessness, especially for those with disabling conditions who have experienced homelessness the longest. Although the Ohio BoSCoC has many fewer project-based PSH developments than other CoCs, in the last 10 years our CoC has created more than 400 new PSH units supported, in part, by tax credit programs administered by OHFA. We greatly appreciate OHFA's continued commitment to PSH development and its work supporting homeless response systems to develop a multitude of housing options for our most vulnerable neighbors.

The Ohio BoSCoC does, however, have significant concerns about some proposed changes in the draft 2026-2027 QAP and their potential impact on Ohio BoSCoC communities' ability to continue to develop PSH and affordable housing.

General Comments

- **Regional Framework**

- The Ohio BoSCoC appreciates OHFA's efforts to encourage housing development across Ohio. However, we are concerned about the number of counties within our CoC that have been categorized as 'metropolitan' within the regional framework. Our CoC's counties historically struggle to compete for tax credits against our more urban neighbors for a variety of reasons, and we are concerned that the regional framework may exacerbate those challenges, particularly for those counties now designated as 'metropolitan'. For example, in the Southwest Region, Miami County is designated as a metropolitan county just like Montgomery County, which means proposed projects located in those counties could be in competition with each other. Historically, smaller projects, projects with higher per unit costs/LIHTC per unit requests, and projects located in neighborhoods with less 'opportunity' struggle to compete for tax credits, yet these are the very features that define many projects located in communities outside of the 8 largest urban areas. The Ohio BoSCoC strongly urges OHFA to reconsider its designation of counties located within the Ohio BoSCoC as 'metropolitan' with the regional framework, and to instead designate all Ohio BoSCoC counties as 'rural'.

- **Neighborhood Opportunity Index**

- The Ohio BoSCoC is greatly concerned about the scoring weight attributed to the Neighborhood Opportunity Index. We believe Ohio BoSCoC communities would be disproportionately negatively impacted by this particular scoring metric. In looking at the Ohio Opportunity Indices draft map, it is clear that entire counties within the Ohio BoSCoC would be unable to compete for tax credits for projects given the low scores assigned for this metric.
- The weighting of the Neighborhood Opportunity Index is particularly troubling for the Special Housing Needs pool. As is well known, siting PSH projects is incredibly challenging even in the best of times. We fear that the emphasis on the Neighborhood Opportunity Index, combined with the low scoring census tracts, and limited options for project siting, will essentially cause potential PSH developers to walk away from rural communities altogether. The Ohio BoSCoC strongly encourages OHFA to consider greatly reducing the weighting of the Neighborhood Opportunity Index score for all pools. For the Special Housing Needs pool specifically, we encourage OHFA to reduce the scoring weight of the Neighborhood Opportunity Index even further and potentially consider removing it from scoring altogether.

Tenant Populations with Special Housing Needs

- **Allocation Targets**

- The Ohio BoSCoC strongly encourages OHFA to re-evaluate the eligible target populations included in this pool and identify as a secondary priority those target populations not currently identified in the *Ohio Interagency Council on Homelessness and Affordable Housing PSH Policy Framework*. PSH projects offer specialized and unique services and supports to their residents, based on evidence tying these specific interventions to key outcomes, like ending homelessness. If the housing needs of potential target populations can be addressed through the provision of general affordable housing, the CoC would recommend that OHFA promote the use of the General Occupancy Pool to meet these needs for now. If future research indicates a clear and direct need specifically for PSH to address the unique needs of some of these additional potential target populations, the CoC would welcome a re-exploration of the Special Housing Needs pool at that time.

- **Expert Recommendation**

- In addition to the items that OHFA requires be included in the required letter of recommendation, the Ohio BoSCoC also recommends that OHFA require these letters to include verification from the CoC/public entity that 1) the CoC/public entity has reviewed the project proposal, including the service plan, and agrees the service plan is sufficient and comports with relevant evidence-based practices and 2) the CoC/public entity agrees the overall project proposal appears to be of high quality, addresses a clearly defined local need, and appears likely to be successful.

- **Balance of State Set Aside**

- The Ohio BoSCoC strongly encourages OHFA to remove Montgomery and Summit counties from the 'Balance of State Set Aside' (like Cuyahoga, Franklin, and Hamilton counties are). This will enable more rural communities to more fairly compete for tax credits.

Thank you for the opportunity to provide comments on the draft QAP.

Respectfully,



Erica Mulryan
CoC Director, Ohio BoSCoC
COHHIO