
2026 9% QAP Comments

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To QAP, OHFA <QAP@ohiohome.org>

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1. I like how the Community Impact Strategic Initiative is ranked after the other set-asides and the competitive scoring. (page 12). I believe this fulfills the intent of this set-aside by funding worthy projects that would not otherwise have been funded.
2. Can a timeline for OHFA's turnaround of Architectural Review be provided in the Final Application Process (page 12)? It seems unfortunate that a project would be delayed in receiving its Carryover Allocation Agreement due to circumstances outside of its control.
3. Building, Unit and Lifestyle Amenities – In general I am not in favor of requiring projects to include additional amenities that increases the cost of projects and that reduce funding opportunities for actual housing units and also reduce square footage and site area that could be used for additional housing units. At a minimum if OHFA is going to require projects to add amenities that increase the cost of developments, an associated increase in the Maximum LIHTC Request, Cost Containment and LIHTC per unit should be increased.
 - a. Build Amenities – I Would be in favor of removing these requirements all together.
 - i. How have the square footages for each space been determined? Why do only some of the spaces have specific areas defined?
 - ii. Is the 500 sqft noted for the Community Kitchen and Multipurpose Room a combined square footage for both spaces or 500 for each, for a total of \$1,000 sq. ft?
 1. Does the community kitchen has specific requirements? Is a commercial exhaust hood/kitchen equipment going to be required by OHFA/ building/mechanical code?
 2. Note that at 500 sqft, especially with kitchen equipment, an additional efficiency unit could be constructed instead and provide someone with a needed home.
 - iii. For the outdoor patio area, if the area exceeds 400 sq.ft. is 50% still required to be covered or is only 200 sq. ft. required to be covered regardless of the size of the outdoor patio?
 - iv. What are the requirements/definition of a Bike Storage Locker?
 - v. Dog Park – IF the project is in immediate proximity to a public dog park could it claim points for this?
 - vi. Are Investment Tax Credits still a thing?
 - b. Unit Amenities - I am generally more in favor with these requirements, and I feel like two is the right number.
 - i. Washer/Dryer hookup with on-site facilities: Please consider an exception for efficiency units
 - ii. Note that the Additional Enclosed Storage Space per Unit amenity may have the unintended effect of reducing the actual available living space in a unit.
 - iii. Allow the Panty storage closet be provided via a Pantry Cabinet

- c. Lifestyle Amenities – I would be in favor of removing all of these requirements, and certainly reducing the number of required amenities.
- i. Outdoor walking path – is there a length requirement for this? Can I just point to a sidewalk at the front of the property, especially if it connects to other sidewalks since sidewalks are both outside and intended for walking on?
 - ii. Security Deposit – Why \$200? That may represent ½ a months rent for a 30% efficiency unit by only 1/10 of a month's rent for a 4 bedroom at 60%. Change this to Security Deposit of 50% of rent. Also note that security deposits are a critical piece of a successfully operating and maintaining these projects for the full 30 year compliance period.
- 4. Cost Containment – OHFA should allow for an exception request to be submitted for both TDC per Unit and TDC per GSF and allow these request to be evaluated on a case by case scenario.
 - 5. Statewide Redistribution – Allow projects that are funded via the unused “rollup credits” to exceed the county limits New Affordability General Occupancy and Senior
 - a. Further do not count any set-aside against a county limit.
 - 6. Can a single Census Tract receive multiple LIHTC awards?
 - 7. How will the increase in the 9% allocation included in the recently passed legislation allocation of the credits across pools?
 - 8. 811 Units – OHFA's 811 staff is requesting that all 811 units be accessible, this should be captured somewhere prior to a funding agreement is sent.
 - 9. Preserved Affordability – LIHTC Resyndications – It feels like these should be a preference given to older projects.
 - 10. Build America, Buy America – Consider Increasing the HOME Funds awarded to projects to allow compliance with these requirements.
 - 11. Experience and Capacity Review – I find it a bit confusion to have the E/C requirements listed in Appendix A when they are intended to be a separate approval process.
 - 12. Site and Neighborhood Standards Form / Unit Comparability Form – page 10 notes that this is due with the Experience and Capacity Package, but pages 61&63 notes that this is due with Proposal Application. Please advise
 - 13. Site Visit Documentation – Is this really needed? What is the intent of this, especially with GPS? If a project doesn't have an address can't the coordinates be used? All of this information is provided in the AHFA
 - 14. Utility Allowances – On January 29, 2025, OHFA issued a Compliance Update from the Multifamily Housing department regarding the New 2025 HOME Rule. Under the new rule the statute, “Allows the PHA utility allowance to be used for HOME units. The 2025 HOME Rule also allows HUD's Utility Schedule Model, estimates, and an engineer's consumption model for HOME units.” Can you please confirm that HOME projects are able to use the PHA utility allowance, similar to the 2025 9% QAP?

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