



August 1, 2025

VIA EMAIL: QAP@ohiohome.org

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

RE: 2026-2027 9% LIHTC QAP – First Draft

Thank you for the opportunity to comment on OHFA's First Draft of the 2026-2027 9% LIHTC QAP. Preservation of Affordable Housing (POAH) values the opportunity to share our perspective as OHFA updates and changes.

As OHFA continues to refine the 2026-2027 9% LIHTC QAP, we hope you will consider these recommendations:

Application Limits

As POAH has mentioned in past comments on the 4% drafts, we appreciate OHFA's changes to the Experience and Capacity standards that would allow developers with substantial out-of-state LIHTC experience more than one reservation.

POAH strongly encourages OHFA to implement these experience and capacity standards consistently across all its LIHTC programs, including 9%. In the last 10 years, POAH has successfully placed into service fourteen (14) 9% projects in states other than Ohio, but are limited to only one application under the current draft.

Allowing only one 9% application from sponsors with significant non-Ohio LIHTC experience prevents high-capacity sponsors – who may be responsible for many OHFA-assisted properties – from effectively pursuing the resources their properties need to address mounting capital needs. Residents of these properties, and their surrounding communities, suffer real harm as a result.

Scoring

POAH recognizes that OHFA is working diligently to update its QAP scoring by utilizing data from the American Community Survey and other governmental sources.

For both the Neighborhood Opportunity Index and the Housing Needs Index, POAH would encourage that there be separate standards or scoring rubric for preservation rehab projects. As

they are currently drafted, these standards are geared towards new construction projects and put preservation at a disadvantage when directly competing.

For preservation projects, developers cannot design a unit mix, or select a competitive location, or select a resident population in response to a QAP priority, as they are able to do for new construction. These projects fail to meet the minimum threshold solely based on the surrounding census tract, which it has no control over. Preservation projects provide valuable affordable housing, and their communities and residents deserve the investment to keep these resources available.

POAH understands the complexity of creating a scoring system that considers many factors. While these policies are still being drafted, we would encourage OHFA to also include the points awarded for each dimension and not just the total maximum points that could be awarded. This would allow development teams to better understand how their project scores in specific areas or features.

Additionally, while POAH understands that the map included with the QAP is a draft, the lack of scoring information -other than if a census tract meets the minimum threshold- creates uncertainty. As an example, of POAH's four prospective applications in Ohio, none meets the minimum threshold requirement for general occupancy but all four are existing projects in critical need of preservation. Having a transparent scoring process is not only important in helping owner/developer's know how to best position the application for success, it also helps determine whether a particular project is likely competitive and warrants the significant time and expense necessary to submit a complete application.

Amenities

POAH appreciates the amount of outreach that OHFA has put into developing this section, including the survey earlier this year. These categories give a development team a mix of options to choose from that best fit their project. We would ask that there be a carve out or exemption request for both preservation deals and scattered site projects. While POAH would like to include as many of these options as possible, architectural limitations of existing buildings make it challenging to provide building and lifestyle amenities.

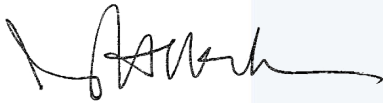
Preservation

POAH thanks OHFA for not having a maximum on hard construction costs for rehab projects. This will encourage development teams to implement a robust scope of work covering both building wide and unit specific improvements.

The proposed preservation allocation goal is 15%, down from 20% in the previous QAP. POAH would respectfully request that OHFA keep the 20% allocation goal for preservation. According to research by the National Housing Trust, of the 30 state QAPs that provide a preservation allocation, the average is 20%. We would encourage OHFA to restore the 20% allocation to allow existing housing to benefit from reinvestment without the risk of losing affordability.

We would be happy to discuss or elaborate on these comments if that would be helpful to OHFA as you continue to refine these updates. Again, we deeply appreciate OHFA's commitment to ensuring this QAP is the best possible reflection of Ohio's housing needs and priorities.

Sincerely,

A handwritten signature in black ink, appearing to read 'Molly Ekerdt', written over a light blue background that features a faint, stylized house silhouette.

Molly Ekerdt
Vice President
Preservation of Affordable Housing (POAH)